

Agenda Item #15.F.



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

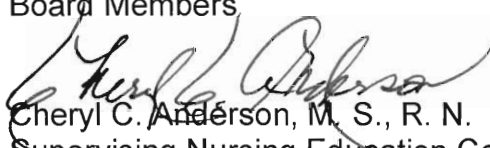
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DATE: February 9, 2011

TO: Board Members

FROM: 
Cheryl C. Anderson, M. S., R. N.
Supervising Nursing Education Consultant

SUBJECT: Walter Jay M.D. Institute, AKA Hamilton State College, Vocational Nursing Program – Reconsideration of Revocation; Request to Admit Students (Director: Eunice Walker, Los Angeles, Los Angeles County, Private)

On September 16, 2010, the Board denied Walter Jay M.D. Institute, also known as Hamilton State College, Vocational Nursing Program's request to admit 30 students into a full – time class commencing December 15, 2010, with a projected graduation of December 16, 2011. Additionally, the Board revoked the program's provisional accreditation effective September 16, 2010, and directed that the program be removed from the *List of Accredited Vocational Nursing Schools*. (See Attachments A & B)

That action was taken due to the program's continued noncompliance with regulatory requirements set forth in Section 2530(l) of the Vocational Nursing Rules and Regulations, which states:

"The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

- (1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation."

Correspondence informing the program of the Board's decisions was forwarded on September 28, 2010 (see Attachment C).

On October 4, 2010, the Board received correspondence from the program dated September 23, 2010. Specifically, the program requested reconsideration of the Board's decisions rendered at the September 16, 2010 Board meeting. The program opined that reconsideration of the program's provisional accreditation had been negatively impacted by its placement on the Board agenda and that adequate consideration had not been

given to the additional information presented by the program at the Board meeting (see Attachment D).

On October 16, 2010, the assigned consultant forwarded correspondence to the director. Specifically, the director was advised that the Board was scheduled to reconsider its decisions to deny approval for the admission of students and revocation of the program's provisional accreditation on February 25, 2011 (see Attachment E).

On January 13, 2011, the Supervising Nursing Education Consultant forwarded correspondence to the director requesting the submission of documents for Board presentation (see Attachment F). On January 28, 2011, the Board received the requested documents (see Attachment G).

The specific area of deficiency referenced in the Board's September 16, 2010 decision, and addressed by the program in the October 4, 2010 correspondence, follows.

Violation #1: Failure to comply with Section 2530 (l) of the Vocational Nursing Rules and Regulations, in that the program failed to maintain a yearly average minimum pass rate on the licensure examination that did not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

As noted in the consultant's written report dated September 1, 2010, and presented orally September 16, 2010, examination statistics furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," substantiate that Walter Jay M.D. Institute Vocational Nursing Program, also known as Hamilton State College Vocational Nursing Program, failed to achieve an average annual pass rate on the NCLEX-PN® that was within 10 percentage points of the state average annual pass rate for eleven (11) consecutive quarters. As such, the program was in violation of section 2530(l) of the Vocational Nursing Rules and Regulations for the periods October 2007 through June 2010.

On September 12, 2008, the Advisory Committee placed the program on provisional accreditation due to noncompliance with the Vocational Nursing Rules and Regulations. That recommendation was adopted by the designee of the Director of the Department of Consumer Affairs on September 26, 2008. On October 1, 2008, the Board forwarded written notification relative to the program's accreditation status, specific areas of noncompliance, and requirements for correction. (See Attachment F)

On **May 22, 2009**, the Board reconsidered the program's accreditation status and request to admit students. **At that time the program's average annual pass rate was 35%;** the program had been noncompliant for six (6) quarters. The Board approved the program's request to admit students and directed issuance of a revised Notice of

Noncompliance and Requirements for Correction. The Board directed that the **program must bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate by September 11, 2010.** On June 18, 2009, the Board forwarded notification relative to the program's accreditation status, specific areas of noncompliance, and requirements for correction (see Attachment H).

As noted previously, on September 16, 2010, the Board revoked the program's provisional accreditation effective September 16, 2010, and directed that the program be removed from the *List of Accredited Vocational Nursing Schools*.

The following table summarizes the program's pass rates from October 2007 through June 2010.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Oct – Dec 2007	76%	65%	-11
Jan – Mar 2008	75%	50%	-25
Apr – Jun 2008	74%	48%	-26
Jul – Sep 2008	74%	44%	-30
Oct – Dec 2008	73%	11%	-62
Jan – Mar 2009	72%	35%	-37
Apr – Jun 2009	70%	26%	-44
Jul – Sep 2009	72%	23%	-49
Oct – Dec 2009	73%	21%	-52
Jan – Mar 2010	74%	17%	-57
Apr – Jun 2010	75%	10%	-65

Based on the most recent data available **at the time of the Board's decision (April – June 2010), the program's average annual pass rate was 10%.** The California annual average pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period was 75%. As such, the **program's average annual pass rate was 65 percentage points below the state average annual pass rate at the time of the Board's decision.**

Consultant's Conclusion:

As specified in the consultant's written report dated September 1, 2010, and reported orally at the September 16, 2010 Board meeting, the assigned consultant contacted the director relative to the low pass rates of program graduates on the NCLEX/PN® on **March 11, 2008.** **At that time, the program's average annual pass rate was 65%, eleven (11) percentage points below the State average annual pass rate.** The director was requested to evaluate the program's admission standards, teaching effectiveness, and other factors negatively impacting student achievement.

On September 12, 2008, the Board placed the program on provisional accreditation for the two – year period, September 12, 2008, through September 11, 2010, due to six (6) violations of the Vocational Nursing Rules and Regulations. **On May 22, 2009**, the Board reconsidered the program's accreditation status and request to admit students. **At that time, the program's average annual pass rate was 35%.** The Board directed that the program must bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate by **September 11, 2010.**

On June 28, 2010, the Board received correspondence advising that the program had been purchased by the current owner, Steve Kim. Additionally, Mr. Kim reported a change in program administration effective September 2010. On August 23, 2010, the Board received electronic correspondence from the owner advising that the name of the school, formerly known as Walter Jay M.D. Institute Vocational Nursing Program, had been changed to Hamilton State College Vocational Nursing Program.

On **September 16, 2010**, the Board revoked the program's provisional accreditation due to continued noncompliance with regulatory requirements. **At that time, the program's average annual pass rate was 10%, 65 percentage points below the State average annual pass rate.**

At the September 16, 2010 Board meeting, the director questioned the accuracy of information reported relative to the dates of program admissions and numbers of students admitted per class. The following table delineates class admissions as approved by the Board since the program's inception. Additionally, the table includes actual program enrollment and student completion data as reported by the program's prior directors.

APPROVED ENROLLMENT/ADMISSION ANALYSIS					
Date of Board Approval	CLASS DATES		Maximum Approved Admissions	Reported Actual Program Enrollment	
	Start	Completion		# Student Admissions	# Student Completions
2/03/06	5/06 (Initial Class)	6/07	40	39	31
04/12/07	8/07 FT	6/08	45	45	41
04/12/07	8/07 PT	9/08	45	45	44
5/22/09	6/09 FT	4/10	50	30	25
11/04/09	12/09 FT	3/11	30	NOT ADMITTED	N/A
TOTAL			210	159	141

The following table summarizes the program's pass rates from **October 2007 through December 2010.**

NCLEX-PN® Licensure Examination Data						
Quarterly Statistics					Annual Statistics*	
Quarter	# Candidates	# Passed	% Pass ed	State Quarterly Pass Rate	Program Annual Average Pass Rate	State Annual Average Pass Rate
Oct - Dec 2007	17	11	65%	76%	65%	76%
Jan - Mar 2008	5	0	0%	75%	50%	75%
Apr - Jun 2008	1	0	0%	70%	48%	74%
Jul - Sep 2008	2	0	0%	74%	44%	74%
Oct - Dec 2008	1	1	100%	73%	11%	73%
Jan - Mar 2009	27	10	37%	70%	35%	72%
Apr - Jun 2009	28	4	14%	71%	26%	70%
Jul - Sep 2009	9	0	0%	73%	23%	72%
Oct - Dec 2009	6	1	13%	76%	21%	73%
Jan - Mar 2010	3	1	33%	75%	17%	74%
Apr - Jun 2010	2	0	0%	75%	10%	75%
Jul - Sep 2010	No Candidates Tested			76%	18%	75%
Oct - Dec 2010	No Candidates Tested			77%	20%	76%

*The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three quarters by the number of candidates who tested during the same period.

Based on the most recent data available (October – December 2010), the program's average annual pass rate is 20%; however, it must be noted that the program has had no graduates tested during the past two (2) periods, (July – September 2010; October - December 2010). The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 76%. Therefore, based on the most recent data, the annual average pass rate for the Walter Jay M.D. Institute, also known as the Hamilton State College, Vocational Nursing Program, is **56** percentage points **below** the state average annual pass rate.

In the program's document received October 4, 2010 and January 28, 2011, the Director states that the program has made a "...good faith effort to correct violations..." The director notes that the one area of noncompliance remaining is violation of section 2530 (l) of the Vocational Nursing Practice Act. To address this violation, the following interventions were reported.

1. Development and implementation of new Admission Criteria including the use of HESI Admission Assessment Examination and the Scholastic Level Examination (SLE).
2. Implementation of mandatory homework assignment and tutoring sessions.
3. Implementation of supervised computerized 1-hour examination review weekly and NCLEX preparation examinations every four (4) weeks.

4. Implementation of ongoing ATI Assessments. As presented, students were tested weekly starting with Module 2 using the ATI instrument.
5. Revision of the criteria for program graduation to specify a requirement that students pass the ATI-PN Comprehensive Predictor prior to graduation. As presented, all students have passed with a score equal to or higher than the ATI national mean.
6. Scheduling of a virtual and live ATI Seminar for October 15 – 17, 2010. The live seminar was taught by an ATI instructor from the Assessment Technology Institute – Kansas headquarters.

Recommendations:

Deny reconsideration of the revocation of provisional accreditation of the Walter Jay M. D., Institute, also known as Hamilton State College Vocational Nursing Program.

Rationale: Denying reconsideration will uphold the Board's September 16, 2010 decisions to:

1. Revoke the provisional accreditation of the Walter Jay M.D., Institute, also known as Hamilton State College, Vocational Nursing Program, effective September 16, 2010.
2. Remove the program from the *List of Accredited Vocational Nursing Schools*.

The program has failed to demonstrate compliance with California Business and Professions Code, Division 2, Chapter 6.5, Article 4 and California Code of Regulations, Division 25, Chapter 1, Article 5 for the past 12 consecutive quarters.

From October 2007 through September 2010, 101 program graduates completed the licensure examination. Of that total, 28 have passed. As such, **27.72%** of the program's total candidates **passed** the licensure examination; while **72.28%** of the program's total candidates **failed** the licensure examination from October 2007 through June 2010

Based on the most recent statistics, October – December 2010, the program's average annual pass rate is 20%. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 76%. As such, the average annual pass rate for the Walter Jay M.D. Institute Vocational Nursing Program, also known as the Hamilton State College, Vocational Nursing Program, is **56** percentage points **below** the state annual average pass rate.

If the Board upholds its prior decision to revoke the program's accreditation, no students will be impacted. Based on submitted

program enrollment data, the last class was admitted June 2009 and graduated September 10, 2010.

On September 30, 2010, the Board received applications for 25 program graduates. On November 10, 2010, Board staff completed confirmation of and transmitted graduates' eligibility for vocational licensure to Pearson VUE. After transmittal, the graduates are authorized to test from November 10, 2010 through May 9, 2011.

- Attachment A: Board report dated September 1, 2010.
- Attachment B: Program correspondence dated September 10, 2010; presented at September 16, 2010 Board meeting.
- Attachment C: Board correspondence dated September 28, 2010.
- Attachment D: Program correspondence dated September 23, 2010; received October 4, 2010.
- Attachment E: Board correspondence dated October 16, 2010.
- Attachment F: Board correspondence dated January 13, 2011.
- Attachment G: Program correspondence dated January 26, 2011; received January 28, 2011.
- Attachment H: Board correspondence relative to Notice of Non Compliance and Requirements for Correction dated June 18, 2009.

Agenda Item #15.F. – Attachment A



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER GOVERNOR
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DATE: September 1, 2010

TO: Board Members

FROM: Cheryl C. Anderson, M.S., R. N.
Supervising Nursing Education Consultant

SUBJECT: Walter Jay M.D. Institute Vocational Nursing Program – Reconsideration of Provisional Accreditation
(Director: Doreen Tan, Los Angeles, Los Angeles County, Private)

Walter Jay M.D. Institute Vocational Nursing Program is presented to the Board for reconsideration of its provisional accreditation. The program's status was changed to provisional accreditation on September 12, 2008, for the two – year period from September 12, 2008, through September 11, 2010. That action was taken due to the program's noncompliance with Vocational Nursing Rules and Regulations.

On May 22, 2009, the Board reconsidered the program's accreditation status and request to admit students. The Board approved the admission of students and directed issuance of a revised Notice of Noncompliance and Requirements for Correction.

The following table shows the variance of the program's pass rates from the state average annual pass rates of first time graduates of accredited vocational nursing programs for the past 11 quarters. This data substantiates the program's continued noncompliance with Section 2530(l) of the Vocational Nursing Rules and Regulations.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Oct – Dec 2007	76%	65%	-11
Jan – Mar 2008	75%	50%	-25
Apr – Jun 2008	74%	48%	-26
Jul – Sep 2008	74%	44%	-30
Oct – Dec 2008	73%	11%	-62
Jan – Mar 2009	72%	35%	-37
Apr – Jun 2009	70%	26%	-44
Jul – Sep 2009	72%	23%	-49
Oct – Dec 2009	73%	21%	-52
Jan – Mar 2010	74%	17%	-57
Apr – Jun 2010	75%	10%	-65

The program requests approval to admit 30 full – time students on December 15, 2010, with a projected graduation of December 16, 2011.

On August 23, 2010, the Board received electronic notification that the name of the school had been changed to Hamilton State College.

History of Prior Board Actions

- On February 3, 2006, the Executive Officer approved the Walter Jay M.D. Institute to begin a vocational nursing program with an initial class of 40 students on March 1, 2006 only, and approved the program curriculum for 1588 hours, including 634 theory, and 954 clinical hours.
- On February 6, 2006, the director notified the Board that commencement of the initial class was delayed to May 2, 2006, with a projected graduation date of June 29, 2007.
- On April 12, 2007, the Executive Officer approved initial full accreditation for the Walter Jay M.D. Institute Vocational Nursing Program for the period April 12, 2007, through April 11, 2011, and issued a certificate accordingly. The Executive Officer also approved the program's request to admit a full-time class of 45 students to commence August 6, 2007 only, to **replace** students graduating June 29, 2008, thereby increasing class size; **and** approved the program's request to admit 45 students into an evening part-time program starting August 6, 2007 only, with a projected graduation date of September 25, 2008, thereby increasing the frequency of admissions.
- On March 11, 2008, Board staff contacted the Walter Jay M.D. Institute Vocational Nursing Program relative to its low pass rate on the NCLEX/PN[®]. The director was requested to evaluate the program's admission standards, teaching effectiveness, and other factors that may be affecting the students' performance.
- **On July 8, 2008, the program director resigned.**
- **On July 22, 2008, a new program director was approved.**
- On September 12, 2008, the Advisory Committee recommended placement of the Walter Jay M.D. Institute Vocational Nursing Program on provisional accreditation for a two-year period, September 12, 2008, through September 11, 2010, due to six (6) violations of the Vocational Nursing Rules and Regulations; and issuance of a notice identifying specific areas of noncompliance and requirements for correction as referenced in section 2526.1(e) of the Vocational Nursing Rules and Regulations. Additionally, the Advisory Committee deferred consideration of the program's request to admit a full-time class of 50 students, to a later date when sufficient resources are available and verifiable.
- On September 26, 2008, the Advisory Committee's recommendations were adopted by the designee of the Director of the Department of Consumer Affairs (DCA).
- On October 1, 2008, Bureau staff forwarded written notification relative to the change in the program's accreditation status, specific areas of noncompliance, and requirements for correction as referenced in Section 2526.1(e) of the Vocational Nursing Rules and Regulations (Notice of Change in Accreditation Status).

- On November 13, 2008, Bureau staff notified the program that the average annual pass rates for Walter Jay M.D. Institute Vocational Nursing Program had fallen more than the (10) percentage points below the state average annual pass rate for four (4) consecutive quarters. Bureau staff requested an analysis of the program and written plan for improving program pass rates.
- On January 15, 2009, Board staff requested the following information required to process the program's request to admit a replacement class:
 1. All program actions taken to correct the six (6) violations as specified in the report to the Advisory Committee, dated September 2, 2008.
 2. List of current faculty.
 3. Clinical rotation calendar or plan, including the following information.
 - a. Names and phone numbers for all currently approved clinical facilities;
 - b. Dates of Board approval per facility;
 - c. Type or classification of clinical experience;
 - d. Number of students authorized by the facility; and
 - e. Number of students assigned.
 4. Current and projected student enrollment including the August 2007 classes that graduated in November 2008.
 5. Clinical rotation calendar for Maternity and Pediatric clinical rotations.
 6. Comprehensive plan to address the program's low performance statistics on the NCLEX/PN based on a full analysis of all program elements including the curriculum, faculty, facilities, resources, and other variables that may impact student achievement.
- On January 20, 2009, the Board received program correspondence and supporting documents addressing actions taken to address previously identified violations. Additionally, the program submitted an analysis of existing program elements and a plan for improving the pass rates of program graduates on the NCLEX/PN®.
- On February 27, 2009, the Executive Officer deferred action on the program's request to admit a full-time class of 50 students to **replace** students who graduated in November 2008 for consideration by the Board on May 22, 2009. That action was taken due to the program's provisional accreditation status and the program's annual average pass rates on the NCLEX/PN®.
- On March 4, 2009, the program was notified of the Executive Officer's decision relative to its request. Additionally, the program was informed that Board consideration of the program's request was scheduled for May 22, 2009.
- On March 5, 2009, the program submitted email correspondence relative to actions taken in response to program need.
- On March 18, 2009, the Board notified the program that its average annual pass rates had fallen more than ten (10) percentage points below the state average pass rate for five (5) consecutive quarters.

- On April 8, 2009, the assigned consultant requested program information relative to current and projected enrollment, approved faculty, approved clinical facilities, and a clinical rotation calendar.
- On April 10, 2009, the Board received program correspondence per fax relative to current and projected enrollment, approved faculty, approved facilities, and clinical rotations.
- On April 16, 2009, Board staff received program correspondence per fax relative to prior correspondence and a "Checklist for Faculty Termination.
- On May 22, 2009, the Board reconsidered the program's accreditation status and its request to admit students. The Board approved the admission of students and directed issuance of a revised Notice of Noncompliance and Requirements for Correction
- **On June 8, 2009, a new program director was approved.**
- On June 18, 2009, the Board forwarded correspondence per certified and regular mail notifying the program of the change in its accreditation status and required corrections.
- On November 4, 2009, the Executive Officer approved the Walter Jay M.D. Institute Vocational Nursing Program's request, to admit a full-time **replacement** class for students graduating October 4, 2009, with 30 students to start on December 7, 2009, only, with an anticipated graduation date of March 12, 2011.
- On March 15, 2010, the Board received program correspondence dated March 1, 2010, relative to the director's comprehensive program analysis and plan of correction.
- On June 28, 2010, the Board was notified that the program had been sold. Additionally, the new owner reported his plans to hire a new program director.
- On July 13, 2010, the Board received correspondence from the program's new owner reporting a change in program administration effective September 2010.
- On July 26, the Board received correspondence from the owner relative to the program's plan of correction and plans to admit additional students in the future.
- On August 3, 2010, the Board received email correspondence from the owner stating that admission of the 30 students approved on November 4, 2009, will commence September 3, 2010.
- On August 13, 2010, the assigned consultant forwarded email correspondence strongly recommending that commencement of a new class be delayed until after September 16, 2010.
- On August 23, 2010, the Board received electronic notification from the owner that the name of the school formerly known as Walter Jay M.D. Institute had been changed to Hamilton State College.

Enrollment

The program is approved to offer both a full – time class and a part – time class, Board approval is required prior to the admission of each class. The pattern of admissions for current and proposed classes is seen in the enrollment table below.

The following table represents **projected** student enrollment based on the current and proposed class start. The table indicates a **maximum enrollment of 85 students** from **May 2006 through December 2010**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
5/06		39	31	31
	7/07 (5/06 Class)		-31	$31 - 31 = 0$
8/07 (FT)		45	41	$0 + 41 = 41$
8/07 (PT)		45	44	$41 + 44 = 85$
	11/08 (8/07 FT)		- 41	$85 - 41 = 44$
	11/08 (8/07 PT)		- 44	$44 - 44 = 0$
6/09 (FT)		30	25	$0 + 25 = 25$
9/10 (FT) (Projected)		30		$25 + 30 = 55$
	9/10 (6/09 Class)		-25	$55 - 25 = 30$
12/10 (FT) (Proposed)		30		$30 + 30 = 60$

Licensing Examination Statistics

The following statistics, furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period October 2007 through June 2010, specify the pass percentage rates for graduates of Walter Jay M.D. Institute Vocational Nursing Program, also known as Hamilton State College Vocational Nursing Program, on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data						
Quarterly Statistics					Annual Statistics*	
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Annual Average Pass Rate	State Annual Average Pass Rate
Oct - Dec 2007	17	11	65%	76%	65%	76%
Jan - Mar 2008	5	0	0%	75%	50%	75%
Apr - Jun 2008	1	0	0%	70%	48%	74%
Jul - Sep 2008	2	0	0%	74%	44%	74%
Oct - Dec 2008	1	1	100%	73%	11%	73%
Jan - Mar 2009	27	10	37%	70%	35%	72%
Apr - Jun 2009	28	4	14%	71%	26%	70%
Jul - Sep 2009	9	0	0%	73%	23%	72%
Oct - Dec 2009	6	1	13%	76%	21%	73%
Jan - Mar 2010	3	1	33%	75%	17%	74%
Apr - Jun 2010	2	0	0%	75%	10%	75%
*The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three quarters by the number of candidates who tested during the same period.						

Based on the most recent data available (April – June 2010), the program's annual average pass rate is 10%. The California annual average pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 75%. The annual average pass rate for the Walter Jay M.D. Institute Vocational Nursing Program, also known as the Hamilton State College Vocational Nursing Program, is **65** percentage points **below** the state annual average pass rate.

Faculty and Facilities

Section 2534(d) of the Vocational Nursing Rules and Regulations states:

"For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."

The total number of Board-approved faculty is five (5). Of the total faculty, five (5) are approved to teach in the clinical area.

As noted previously, the program had a maximum enrollment of 85 students from May 2006 through August 2007. From August 2007 through December 2010, a maximum of 60 students is projected.

Based on a maximum enrollment of 60 students, four (4) instructors are needed. Therefore, the number of clinical faculty is adequate for the current and proposed enrollment.

Section 2534(b) of the Vocational Nursing Rules and Regulations states:

"Schools shall have clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas

specified by Section 2533. There must be available for student assignment, an adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught.”

The program’s clinical facilities are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations. This information has been verified by the consultant.

Other Considerations

Examination statistics furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as “Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction,” substantiates that Walter Jay M.D. Institute Vocational Nursing Program, also known as Hamilton State College Vocational Nursing Program, has failed to achieve an annual average pass rate on the NCLEX-PN® that is within 10 percentage points of the state average annual pass rate for the eleven (11) consecutive quarters. As such, the program has been in violation of section 2530(l) of the Vocational Nursing Rules and Regulations for the periods October 2007 through June 2010.

As noted previously, the program was placed on provisional accreditation on September 12, 2008, for the two – year period from September 12, 2008, through September 11, 2010, due to noncompliance with Vocational Nursing Rules and Regulations. Specifically, the assigned consultant identified violations of sections 2534 (a); 2527 (b); 2534 (d); 2527 (a); and 2527 (c). On October 1, 2008, the Board forwarded correspondence per certified and regular mail notifying the program of the change in its accreditation status (see Attachment A).

Subsequently, the director requested approval to admit a full-time class of 30 students on May 25, 2009, with an anticipated graduation of July 1, 2010, to **replace** students who graduated in November 2008.

The Executive Officer deferred action on the program’s request for consideration by the Board at the May 22, 2009 meeting. That decision was based on prior identified violations that remained uncorrected and a new violation of Section 2530(l) of the California Code of Regulations, relative to program pass rates on the licensure examination.

On May 22, 2009, the Board reconsidered the program’s accreditation status and its request to admit students. The Board approved the admission of students and directed issuance of a revised Notice of Noncompliance and Requirements for Correction. On June 18, 2009, the Board forwarded the revised notice per certified and regular mail (see Attachment B).

On November 4, 2009, the Executive Officer approved the program’s request, to admit 30 full – time students on December 7, 2009 only, to **replace** the class that graduated October 4, 2009. Graduation of the new class was scheduled for March 12, 2011.

On March 15, 2010, the Board received correspondence from the director relative an analysis of the program and its plan to improve program pass rates (see Attachment C).

As specified therein, the following corrective actions were implemented prior to the class admitted in June 2009.

➤ **Revised Admission Criteria; Screening and Selection Criteria**

1. Prior to admission, the program requires all applicants to meet with the Program Director, Financial Aid Officer, and Campus Director.
2. A mandatory prep class has been designed to enhance students' achievement in the program. The class is four (4) weeks in length and includes the following content.
 - a. Medical Terminology;
 - b. Anatomy & Physiology;
 - c. Calculations of Dosages; and
 - d. Critical Thinking.

Students are required to obtain a minimum score of 75%.

➤ **Instructional Materials.**

1. Terminal objectives were revised to require students to pass an exit examination prior to graduation.
2. The instructional plan was revised to include the following.
 - a. Weekly examinations have been added.
 - b. Beginning with Module 2, students are required to complete ATI examinations consistent with program content.
3. Textbooks have been updated.

➤ **Evaluations**

1. Faculty

- a. Each instructor is evaluated by the program director after the completion of each module. Signed evaluations are placed in the instructors' file.
- b. Students are asked to evaluate theory presentations at the completion of each module.

2. Clinical Facilities

- a. Clinical facilities are evaluated by students and faculty at the end of each module.
- b. Each clinical facility in which students are assigned is visited weekly by the program director or clinical coordinator.

3. Student Evaluations

- a. A monthly didactic report is completed by the lead theory instructor to provide the director feedback relative to the progress of each student.

- b. Students are evaluated relative to clinical performance every two (2) weeks.
- c. At the end of each module, students are assigned a theory grade (%), a pass/fail clinical grade, and a pass/fail grade in professionalism.

On June 28, 2010, the Board was notified that the program had been sold and that a new program director would be hired. The assigned consultant discussed with the owner regulatory requirements for each vocational nursing program.

On July 13, 2010, the new owner notified the Board of the resignation of the current program director, effective September 2010. On July 26, 2010, the Board received correspondence from the owner relative to a plan to correct program deficiencies. Additionally, the owner advised of his plans to admit students.

On August 13, 2010, the director confirmed her intentions to return to clinical practice in September 2010. Additionally, the director advised of the owner's planned admission of a new class on September 3, 2010.

Subsequently, the assigned consultant forwarded electronic correspondence to the owner strongly recommending that commencement of a new class be delayed until after September 16, 2010. On August 23, 2010, the Board received electronic correspondence from the owner advising that the name of the school formerly known as Walter Jay M.D. Institute had been changed to Hamilton State College (see Attachment D).

In summary, the director has reported implementation of several interventions to address students' deficiencies in knowledge and clinical performance. As presented, those interventions were implemented prior to admission of the June 2009 class.

However, it must be noted that from October 2007 through June 2010, the program's average annual pass rates have declined substantially. Based on the April – June 2010, statistics, the program's **average quarterly** pass rate was **0%**; the **average annual** pass rate was **10%**. As such, the average annual pass rate for the Walter Jay M.D. Institute Vocational Nursing Program is **65** percentage points **below** the state average annual pass rate for the current quarter.

Recommendations:

1. Deny Walter Jay M.D. Institute Vocational Nursing Program's request to admit 30 students into a full – time class commencing December 15, 2010, with a projected graduation of December 16, 2011.
2. Revoke the provisional accreditation of the Walter Jay M.D., Institute Vocational Nursing Program, also known as the Hamilton State College Vocational Nursing Program, effective September 16, 2010.
3. Remove the program from the *List of Accredited Vocational Nursing Schools*.

Rationale: The program has failed to demonstrate compliance with California Business and Professions Code, Division 2, Chapter 6.5, Article 4 and California Code of Regulations, Division 25, Chapter 1, Article 5 for 17 of the past 11 quarters.

From October 2007 through June 2010, 101 program graduates have completed the licensure examination. Of that total, 28 have passed. As such, **27.72%** of the program's total candidates **passed** the licensure examination; while **72.27%** of the total program candidates **failed** the licensure examination from October 2007 through June 2010

Based on the most recent statistics, April – June 2010, the program's average annual pass rate is 10%. The California annual average pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 75%. As such, the annual average pass rate for the Walter Jay M.D. Institute Vocational Nursing Program, also known as the Hamilton State College Vocational Nursing Program, is 65 percentage points **below** the state annual average pass rate.

If the Board revokes the program's accreditation, no students will be impacted. Based on submitted program enrollment data, the last class was admitted June 2009 and is scheduled to graduate September 10, 2010.

Attachment A - Notification of Change in Accreditation Status dated October 1, 2008.

Attachment B - Notification of Change in Accreditation Status dated June 18, 2009.

Attachment C – Program correspondence dated March 1, 2010.

Attachment D – Program correspondence dated August 23, 2010.



BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS

2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833

P (916) 263-7800 F (916) 263-7866 | <http://www.bvnpt.ca.gov>

October 1, 2008

Walter Jay M.D. Institute
Vocational Nursing Program
Doreen Tan, Director
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Dear Ms. Tan:

Pursuant to the recommendation of the Bureau of Vocational Nursing and Psychiatric Technicians Advisory Committee on September 12, 2008, and its adoption by the Director of Consumer Affairs, the status of the Walter Jay M.D. Institute Vocational Nursing Program has been changed from full accreditation to provisional accreditation for the period of September 12, 2008 to September 11, 2010. Please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by **October 15, 2008**.

NOTIFICATION

The following is a description of the violations, and requirements for correction.

Section 2534(a) of the Vocational Nursing Rules and Regulations states:

"Schools shall apply on a form provided by the Board for approval of each clinical facility prior to use."

Violation #1: On January 18, 2008, the former director submitted a clinical facility approval application that indicated that the program began using the facility on December 5, 2007. Thus, the program used a clinical facility prior to Board approval.

Requirements for Correction #1: On August 3, 2008, the new director acknowledged the violation by stating her understanding that clinical facilities must be approved by the Board prior to use. The new director shall submit a plan to prevent recurrence.

Section 2527(b) states:

"A school shall report to the Board within ten days of the termination of a faculty member."

Violation #2: The Walter Jay M.D. Institute Vocational Nursing Program terminated its faculty members without proof of Board notification.

Requirements for Correction #2: On August 3, 2008, the new director acknowledged the violation and stated that all faculty terminations will be reported to the Board within 30 days. The new director shall submit a plan to prevent recurrence.

Section 2534(d) states,

"For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."

Violation #3: More than 15 students were assigned to one clinical instructor in the clinical facilities, thus exceeding the regulatory clinical ratios.

Requirements for Correction #3: On August 3, 2008, the new director acknowledged the violation and stated that faculty will be assigned to students following regulatory ratios. The new director shall submit a plan to prevent recurrence.

Section 2527(a) states,

"The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not accreditation will be continued."

Violation #4: The consultant contacted the former director on April 10, 2008, and issued a violation letter asking for a full accounting of faculty/student assignments for all currently enrolled students for the length of their entire programs. The program response was due on April 13, 2008, due to the urgent need to determine whether or not the students were receiving adequate clinical instruction. The consultant provided telephone contact numbers for the faculty. The former director indicated that the numbers would be forthcoming.

Requirements for Correction #4: The new director submitted an updated faculty/student clinical assignment document showing current clinical assignments. The new director shall submit cell phone numbers of faculty members when they are assigned to clinical sites.

Section 2527(c) states,

"A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of accreditation or provisional accreditation."

Violation #5: The school made false representations or lack of faculty and Clinical Assignment forms submitted to the Board by the former director. The former director failed to provide the Board with information regarding use of teachers as clinical

The former director submitted forms to the Board that contradicted information previously submitted, and failed to account for the differences. The former director failed to respond to the Board request for specific teacher assistant and instructor assignments.

Requirements for Correction #5: The new director shall submit documents that truthfully represent program resources and faculty assignments.

Section 2532 states, in part,

"The course in vocational nursing shall consist of not less than 1530 hours or 50 semester units, and may be given on either a full-time or part-time basis."

Violation #6: On July 29, 2008, the new director submitted a document showing that 58 students of the current student enrollment of 88 students are currently deficient in theory and clinical hours. Students are deficient in up to 214 hours of theory and clinical.

Requirements for Correction #6: The new director submitted plans for remediation for students who are deficient in theory and clinical instructional hours. The director shall submit monthly progress reports for each affected student, and shall certify completion of remediation for each affected student.

Section 2526.1 states, in part,

"A program's failure to correct delineated areas of noncompliance is cause for revocation of provisional accreditation."

RECONSIDERATION

Your program will be placed on the May or September 2010 Board Meeting agenda for reconsideration of your accreditation status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) by the fifteenth day of the second month prior to that Board meeting.

REGULATION SECTION 2526.1

"(a) Provisional accreditation means a program has not met all requirements as set forth in this chapter and in CHAPTER 6.5 VN, Division 2 of the Business and Professions Code."

The term "provisional accreditation" is meant to indicate to the program, students, and potential students that the program IS NOT IN FULL COMPLIANCE with state laws and regulations and may lead to revocation of accreditation.

"(b) Provisional accreditation shall be granted for a period not to exceed 12 months unless the Board grants an extension."

The inclusive dates of provisional accreditation will be established by the Board and tracked by the assigned consultant. The consultant will schedule reports to the Board in a manner that will allow Board consideration of further action prior to the expiration period of the provisional accreditation.

"(c) The Board may place any program on provisional accreditation when a program does not meet all requirements as set forth in this chapter and in Section 2525 VM. A provisional accreditation may be extended when a program demonstrates to the satisfaction of the Board a good faith effort to correct all deficiencies."

The phrase "satisfactory to the Board" means there is objective data to demonstrate compliance with Article 5 regulations.

The phrase "good faith effort" means full cooperation with the formal 11-member Board and Board staff by sending requested information in a timely, organized and legible manner. Additionally, follow through must be evident in relation to identified objectives and statements of intent.

"(d) Any program holding provisional accreditation may not admit "new" students beyond the established pattern of admission previously approved by the Board."

To establish a "pattern of admission" for programs that currently conduct ongoing admissions, the Board has determined that the frequency of admissions for the LATE SIX classes approved by the Board that immediately precede the date of the Board meeting at which accreditation status is to be considered.

For programs that are currently required to come before the Board for prior approval to admit each class, this is the "established pattern" and will continue until the pattern is changed by formal Board action. The number of students per class will be the MAXIMUM number approved by the Board for any of the six classes.

"(e) A program placed on provisional accreditation shall receive written notification from the Board. The notification to the program shall include specific areas of noncompliance and requirements for correction. A program's failure to correct delineated areas of noncompliance is cause for revocation of provisional accreditation."

Should you have questions, please do not hesitate to contact me.

Sincerely,

ANNE POWERS, Ph.D., R.N.
Nursing Education Consultant

Enclosure

cc: Advisory Committee Members



June 18, 2009

Doreen Tan, B.S., R.N., Director
Vocational Nursing Program
Walter Jay, M.D. Institute
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Subject: Notice of Change in Accreditation Status

Dear Ms. Tan:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians on May 22, 2009, the status of the Walter Jay, M.D. Institute Vocational Nursing Program has been changed relative to provisional accreditation. Please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by Friday, June 26, 2009.

AREAS OF NON-COMPLIANCE VIOLATION(S)

This notice summarizes the current status of Board findings based on recent and prior communications identifying program violations. The violations identified relate to the program's non-compliance with requirements set forth in California Code of Regulations (CCR), Title 16, Article 5, Schools of Vocational Nursing.

Section 2534 (a) of the California Code of Rules and Regulations states:

"Schools shall apply on a form provided by the Board for approval of each clinical facility prior to use."

Violation #1: As specified in the consultant's report to the Advisory Committee dated September 2, 2008, the program assigned students to clinical rotations in facilities that had not been approved by the Board (see Attachment A).

Correction #1: This violation has been corrected. The program has proposed student clinical rotations at clinical facilities previously approved by the Board that are consistent with the Board-approved curriculum. Facility representatives have confirmed the sufficiency of clinical experience to facilitate students' achievement of approved objectives.

Section 2527(b) states:

"A school shall report to the Board within ten days of the termination of a faculty member."

$$\frac{d}{dt} \left(\frac{\partial L}{\partial \dot{x}} \right) = \frac{\partial L}{\partial x}$$

Section 2534 (d) states:

Violation #3: The September 2, 2008, report states that the program assigned sixteen (16) students in Term II to Temple Community Hospital. One (1) instructor and one (1) teacher assistant were assigned. Additionally, the program assigned sixteen (16) students in Term II to Integrated Nursing and Rehabilitation Center. One (1) instructor and one (1) teacher assistant were assigned (see Attachment A).

Section 2527 (a) states:

Violation #4: As stated in the September 2, 2003 report, the consultant requested the program to submit documentation of the faculty/student assignments for all currently enrolled students for each term of the program. Cell phone numbers for each instructor were also requested. The program failed to submit the requested documents. (See Attachment A)

11. $\frac{1}{2} \log_2 16 = 2$

Correction #4: This violation has been corrected. The program has submitted Faculty/Student Clinical Assignments for each term in the program. On May 6, 2009, the program submitted the 2006/2007 Annual Report that was due October 1, 2008.

Section 2527(c) states:

"A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of accreditation or provisional accreditation."

Violation #5: As stated in the September 2, 2008, report, the assigned consultant identified material misrepresentations of fact in information and documents submitted to the Board on April 9, 2008. These misrepresentations addressed the assignment of instructors and teacher assistants and the use of teacher assistants to provide theory instruction in violation of section 2530 (d) (see Attachment A).

Correction #5: This violation has been corrected (see Correction #3).

Section 2530(l) states:

"The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

(1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation."

Violation #6: The program's annual average pass rate has been more than ten (10) percentage points below the state average annual pass rate for six (6) consecutive quarters. Those pass rates are set forth in the following table.

Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate
Oct - Dec 2007	76%	65%
Jan - Mar 2008	75%	50%
Apr - Jun 2008	74%	48%
Jul - Sep 2008	74%	44%
Oct - Dec 2008	73%	11%
Jan - Mar 2009	72%	35%

Based on this data, the program failed to meet the annual average pass rate requirements.

REQUIRED CORRECTIONS:

1. In order to return to full accreditation status, the Walter Jay W.D. Institute Vocational Nursing Program must correct Violation #2 and Violation #4 within the 12 weeks of the date of this notice. Additionally, the program must bring annual average pass rate on the National Council Licensure Examination - Practical/Vocational Nurses (NCLEX/PN®) to no more than ten (10) percentage points below the State annual average pass rate by September 11, 2010.
2. The program must prepare and implement a written plan to improve its pass rate and make modifications to the plan as necessary based on the success or failure of the actions taken. That plan must include a comprehensive analysis of the program, specific actions that will be taken to improve program pass rates, and timelines for expected results. The following elements must be addressed in the analysis:
 - a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.
 - h. Textbooks.
 - i. Attendance Policy.
 - j. Remediation Policy.
 - k. Evaluations of Theory and Clinical Faculty.
 - l. Evaluations of Theory Presentations.
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - n. Evaluation of Student Achievement.
3. The program must show documented progress by submitting a follow-up report in 10 months, but no later than March 1, 2010, evaluating the effectiveness of any corrective actions taken by each element listed in number 2 above.
4. The program must comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2525.

Failure to take these corrective actions may cause the Board to revoke the program's accreditation. In the event additional violations of the accreditation standards are identified, such violations may result in further corrective actions, including provisional accreditation.

FUTURE BOARD ACTION

Your program will be placed on the May 2010 Board Meeting agenda for reconsideration of your accreditation status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) by the fifteenth day of the second month prior to that Board meeting.

OTHER IMPORTANT INFORMATION

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: The program must request Board approval prior to the admission of each class.

In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board regulations.

The program may no longer advertise that it has full accreditation, and should take steps to correct any ongoing advertisements or publications in that regard.

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional accreditation is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at www.bvnpt.ca.gov.

Should you have questions, please do not hesitate to contact the Board.

Sincerely,

TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer

Enclosure

cc: Board Members



Walter Jay M.D. Institute,

an Educational Center

501 Shatto Place Suite #120, Los Angeles CA 90020 Office (213) 388-1369 Fax (213) 388-1338

Cheryl Anderson, RN, MSN
BVNPT Nursing Education Consultant
2535 Capitol Oaks Drive
Sacramento CA 95833

March 1, 2010

RE: Comprehensive Program Analysis and Plan of Correction

Dear Ms. Anderson:

A comprehensive analysis of the VN Program yielded the following information. Corrective actions are in bold type and indicated with an asterisk (*). The corrective actions were implemented prior to the start of our present class (June 2009). Positive effects of the changes are already evident as the students' performance on weekly ATI testing is very good and shows steady improvement.

a. Admission Criteria and Screening & Selection Criteria

- All applicants must take the Scholastic Level Exam (SLE). A minimum score of 21 is required.
- The Health Education System, Inc. (HESI) exam is also administered. A minimum score of 75% is required.
- All foreign education must be evaluated prior to admission.
- All students must have proof of high school graduation or equivalent prior to admission.
- Credit granting form will be submitted with application.
- Applicants must meet with the VN Program Director, the Financial Aid Officer, and Campus Director prior to admission. *
- All applicants are screened for criminal records and drug abuse.
- All entering students must attend our mandatory prep classes for 4 weeks and pass with at least 75% before beginning nursing course work. The prep classes include Medical Terminology, Anatomy & Physiology, Calculations of Dosages and Critical Thinking. *

b. Terminal Objectives

- Terminal objectives are in place and appropriate. *
- We are now requiring students to test weekly (starting with Module 2) using the ATI program to prepare for NCLEX. *
- We are now requiring students to pass an NCLEX-style exit exam before graduating. *

c. Curriculum Objectives

- Curriculum objectives are in place and appropriate. *

d. Instructional Plan

- The instructional plan defines objectives and content for each theory/clinical day. *
- Testing is conducted weekly, and covers the previous week's content. *
- The lead theory instructor gives students and the program director feedback on individual progress via a monthly didactic report. *
- Clinical instructors evaluate student progress q 2 weeks. *

- Theory and clinical objectives for each course are clearly defined.*

g. Lesson Plans

- Our lesson plans for each course are in place.*
- Lesson plans present an appropriate systemic and sequential educational methodology.*

h. Textbooks

- The Anatomy and Physiology Learning System, Saunders, 3rd edition.*
- Medical Terminology Short Course, Saunders, 3rd edition.*
- Critical Thinking and Clinical Judgment, Saunders, 4th edition.*
- Comprehensive NCLEX-PN Review Book, Saunders, 15th edition.*
- Leach, Textbook of Basic Nursing, Lippincott, 9th edition.
- Pasdahl Student Workbook for Textbook of Basic Nursing, Lippincott, 9th edition.
- Nurses Clinical Pocket Guide, F.A Davis, 2nd edition.*
- Nurses Drug Guide for Nurses, F.A Davis, 8th edition.*
- Calculate with Confidence, Mosby, 5th edition.*
- NCNDA Nursing Guidebook, F.A Davis, 10th edition.*

i. Attendance Policy

- A comprehensive attendance policy is in place.*
- Our attendance policy places upon students the same demands that an employer will place upon them as employees.*
- Attendance is tracked daily and the policy is strictly enforced.*

j. Remediation Policy

- A remediation policy has been developed which requires a student to attend remediation if his grade average falls below 75%. The student will also be placed on Academia Probation. The student must attend remediation and stay on probation until his grade averages 75% or greater. (However, the probationary period will not exceed a module period.)*
- Remediation is conducted by the VN Program Director or a designated instructor. The program director will track the remediation process, including the follow-up dates.*
- All students who are failing a module will be counseled by the program director three times prior to completion of the module. The form used for remediation counseling includes narrative space for the student to reflect on their situation and plan.*
- All students who do not achieve a passing grade of 75% after remediation and counseling by the program director will be terminated from the vocational nursing program.*
- Students who are terminated from the program will be advised of protocol to request an application from the BVNPT to test via equivalency. Also, terminated students will be advised of the school's appeal process.*

k. Evaluations of Theory and Clinical Faculty

- The VN Program Director evaluates all instructors after each module's completion.
- The signed evaluations are placed in the instructors' files.*

l. Evaluations of Theory Presentations

- The VN Program Director has students evaluate theory presentations at the completion of each module.*
- The VN Program Director reviews the student evaluations of theory presentations and counsels/discusses with instructors, as indicated.*
- The VN Program Director has theory instructors evaluate the instructional program at the conclusion of each module.*
- The VN Program Director maintains a file of theory presentation evaluations.*

m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations

- The VN Program Director has students and faculty evaluate clinical rotations.*

completion of each module.*

- The VN Program Director reviews the evaluations and discusses with the Clinical Coordinator*.
- The VN Program Director and the Clinical Coordinator use the information to make decisions about clinical site placement.*
- The VN Program Director or the Clinical Coordinator visit utilized sites weekly and troubleshoot any identified problems, as well as discuss (with staff, faculty and students) the correlation of theory presentation with clinical patient care practices*.
- The VN Program Director maintains a file of clinical evaluations.*

m. Evaluation of Student Achievement.

- Students are tested weekly in theory.*
- Students receive a monthly evaluation from the theory instructor (Monthly Didactic Report).*
- Students receive bi-weekly evaluations from the clinical instructor.*
- Students receive a report from the theory instructor at the end of each module which includes a theory letter grade based on %, a clinical grade (pass/fail), and a professionalism grade (pass/fail).*
- During the first half of Module 1, students have their clinical skills evaluated in Skills Lab. The Skills Lab Instructor uses the 'Skills Lab Checklist' to evaluate each student.*
- All of the above evaluations are kept on file by the VN Program Director and/or the Student Services Coordinator.*

The previous VN Program Director, Ms. Doreen Tan, worked very hard to develop the program within the BVNPT guidelines. She replaced instructors that were not performing effectively, and instituted weekly NCLEX review classes for previous graduates who failed the NCLEX. I am certain that our present class, slated for graduation at the end of August, will perform well on NCLEX due to the changes made by Ms. Tan and my continuous monitoring of performance and outcomes.

Please let me know if you need any further information or clarification.

Thank you for your kind assistance.

Warm Regards,

Shirley Hiles, RN, DCH
VN Program Director
shirley@wjinstitute.com
310- 490-4733 (Cell)

Cheryl Anderson

From: Y. S. KIM [ipsuniv@gmail.com]
Sent: Monday, August 23, 2010 4:52 PM
To: Cheryl Anderson
Subject: NAME CHANGE OF THE SCHOOL
Attachments: BUSINESS LICENSE.pdf

TO: MS. CHERYL ANDERSON, M.S., R.N.
SUPERVISING NURSING EDUCATION CONSULTANT
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS

FROM: STEVE KIM, OWNER
HAMILTON STATE COLLEGE formerly named as WALTER JAY M. D. INSTITUTE

SUBJECT: REQUEST OF NAME CHANGE

DEAR MS. ANDERSON;

I AM REQUESTING THE NAME CHANGE OF THE SCHOOL FOR THE RECORD WITH BVNTP.

THE FORMER NAME OF THE SCHOOL WAS :

WALTER JAY M.D. INSTITUTE

THE NEW NAME OF THE SCHOOL UNDER THE NEW OWNERSHIP/MANAGEMENT/ADMINISTRATION IS:

HAMILTON STATE COLLEGE

*THE COPY OF THE BUSINESS LICENSE ATTACHED.

* HERewith I AM ALSO INCLUDING THE APPLICATION PACKET OF THE NEW INCOMING PROGRAM DIRECTOR
DR. EUNICE
WALKER FOR YOUR REVIEW AND CONSIDERATION.

ONCE AGAIN THANK YOU FOR YOUR GUIDANCE.

RESPECTFULLY SUBMITTED,

STEVE KIM, OWNER
HEAD OF SCHOOL & CAMPUS DIRECTOR
HAMILTON STATE COLLEGE



CITY OF LOS ANGELES

OFFICE OF FINANCE

P.O. BOX 53200

LOS ANGELES CA 90053-0200

28 100-002840 1005 1

STEVE KIM
HAMILTON STATE COLLEGE
STEVE KIM
501 SHATTO PL STE 120
LOS ANGELES CA 90020-1747

501 SHATTO PLACE #120
LOS ANGELES, CA 90020-1747

THIS CERTIFICATE MUST BE POSTED AT PLACE OF BUSINESS

CITY OF LOS ANGELES TAX REGISTRATION CERTIFICATE

THIS CERTIFICATE IS GOOD UNTIL SUSPENDED OR CANCELLED
BUSINESS TAX

ISSUED: 5/31/2010

ACCOUNT NO.	FUND/CLASS	DESCRIPTION	STARTED	STATUS
0002503229-0001-1	L049	Professions/Occupations	05/01/2010	Active

ISSUED TO

STEVE KIM
HAMILTON STATE COLLEGE
STEVE KIM
501 SHATTO PLACE #120
LOS ANGELES, CA 90020-1747

501 SHATTO PLACE #120
LOS ANGELES, CA 90020-1747



ISSUED BY:

Antoinette D. Christensen

DIRECTOR OF FINANCE



Walter Jay M.D. Institute,
an Educational Center

FAX

Date: September 10, 2010

TO: Cheryl Anderson M.S., RN -Supervising Nursing Education Consultant
Tel: (916) 263-7800

FAX: (916) 263-7866

FR: Eunice Walker, RN, MSN, JD
In-Coming VN Program Director- Walter Jay MD Institute

Tel: (213) 388-1369

FAX: (213) 388-1369

RE: Walter Jay M.D. Institute Reconsideration of Provisional Accreditation

Ms. Anderson please find attached the WJI/Hamilton State College response to BVNPT Consultant's recommendations regarding Reconsideration of Provisional Accreditation for Walter Jay M.D. Institute Vocational Nurse Program.

We appreciate the opportunity to respond. I look forward to the meeting and the opportunity to meet you.

With Regards:

Eunice Walker

WJI/Hamilton State College
In-Coming VN Program

TIME : 09/11/2010 18:41
NAME : WALTER JAY M D INST
FAX : 2133881338
TEL : 2133881369
SER.# : BROJ6J543875

DATE, TIME
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Walter Jay M.D. Institute, an Educational Center

FAX

Date: September 10, 2010

TO: Cheryl Anderson M.S., RN -Supervising Nursing Education Consultant
Tel: (916) 263-7800

FAX: (916) 263-7866

FR: Eunice Walker, RN, MSN, JD
In-Coming VN Program Director- Walter Jay MD Institute

Tel: (213) 388-1369

FAX: (213) 388-1369

RE: Walter Jay M.D. Institute Reconsideration of Provisional Accreditation

Ms. Anderson please find attached the WJI/Hamilton State College response to BVNPT

WALTER JAY INSTITUTE/HSC

DATE: 09-12-2010

TO: CHERYL ANDERSON M.S., RN-SUPERVISING NURSING EDUCATION CONSULTANT

RE: RECONSIDERATION OF PROVISIONAL ACCREDITATION

SUBJECT: CORRECTED PAGE 9 TO 11

TRANSMISSION VERIFICATION REPORT

TIME : 09/12/2010 20:16
NAME : WALTER JAY M D INST
FAX : 2133881338
TEL : 2133881369
SER. # : BROJ6J543875

DATE, TIME	09/12 20:15
FAX NO./NAME	19162637866
DURATION	00:00:55
PAGE(S)	05
RESULT	OK
MODE	STANDARD ECM

WALTER JAY INSTITUTE/HSC

DATE: 09-12-2010

TO: CHERYL ANDERSON M.S., RN-SUPERVISING NURSING EDUCATION CONSULTANT

RE: RECONSIDERATION OF PROVISIONAL ACCREDITATION

SUBJECT: CORRECTED PAGE 9 TO 11



Walter Jay M.D. Institute,
an Educational Center

(dba)
HAMILTON STATE COLLEGE

September 7, 2010

Board of Vocational Nursing & Psychiatric Technicians
Cheryl Anderson M.S., RN -Supervising Nursing Education Consultant
2335 Capitol Oaks Drive- Suite 205
Sacramento, CA. 95833 -2945

RE: Walter Jay M.D. Institute Vocational Nursing Program –Reconsideration of
Provisional Accreditation and Supervising Nursing Education Consultant
Recommendations

Dear Ms. Anderson :

First we want to express our appreciation for the detailed chronology of the issues surrounding your recommendations to the Board of Vocational Nursing & Psychiatric Technicians related to the Reconsideration of Provisional Accreditation of Walter Jay M.D. Institute Vocational Nursing Program.

Although the recommendations are harsh and appear somewhat punitive; we can still appreciate your commitment to the Board's statutory responsibility for the educational preparation of safe and competent practitioners. The Boards commitment in *preparing safe and competent* practitioners are not different from our own as new academic administrators and Board of Directors for the VN program at WJI (HSC). We too are committed to providing all of the necessary resources both academic and fiscally to ensure that students graduating from WJI (HSC) will be competent and safe practitioners able to pass the NCLEX examination required by the board, find suitable placement and succeed in their personal lives and professional careers.

It is ironic that these unfavorable recommendations come at a time when monumental positive change is taking place under new management /ownership at WJI . Change we believe that will allow the VN program to become a Flagship program in the State.

501 Shatto Place Suite #120 . Los Angeles, CA 90020 . Office (213) 385-1369 Fax 388-1338 e-mail
walterjayinstitute.com

Consultant's Recommendations:

While at first glance there appear to be merits to the Consultant's recommendations based on the requirements as set forth in the BVNPT Rules and Regulations, we believe that there are credible arguments that the Board may want to consider before acting upon the recommendations.

Recital:

As with any report there are often items which require corrections and further clarifications. I would like to address these below.

Section I –Record Error

The Program Director of Record as shown on the Consultant's Report to the Board is in error. The Director of record as shown on the Consultant report is Doreen Tan. Ms. Tan served as Director from June 14, 2008–January 22, 2010. Notification of this change was forwarded to the Board. The Director of record is Dr. Shirley Hiles (RN, DCH whose tenure began March 3, 2010).

Caveat:

Dr Hiles tenure will end September 24, 2010. She tendered her resignation on June 3, 2010 to be effective September 24, 2010 at which time Eunice Walker, RN, MSN, JD will become the new Program Director as approved by the board Sep. 2010.

Section 2.0

Provisional Accreditation based on non-compliance to Vocational Rules and Regulations Section 2534 (a); Section 2534 (d), Section 2527 (b); Section 2527 (a); Section 2527 (c).

Although I am sure it was not intended, the introductory statement in the Consultant's report gives the perception that the program did not comply with the cited areas of non-compliance with the Vocational Nursing Rules and Regulations after the Board notified the program of same as documented in **Attachment A of your report.**

Although the report did not include as an attachment the response to the cited violation a report containing a response was forwarded by Doreen Tan, VN Director January 15, 2009. **(See WJI Attachment I).**

The consultant's report did however include acknowledgement that these violations were addressed in the June 18, 2009 report from Dr. Teresa Bello-Jones, RN, MSM, JD titled **Notice of Change in Accreditation** which you included in your report as **Attachment B. (Included as WJI/HSC Attachment II).**

In an effort to address any misconception related to whether each violation has been addressed we believe it would be helpful to restate them along with the acknowledgement by the BVNPT.

Status of Violations

(As documented in the June 18, 2009 report from Dr. Teresa Bello-Jones, RN, MSN, JD titled Notice of Change in Accreditation (WJI Attachment II)

Violation #1 Section 2534 (a)

“ Schools shall apply on a form provided by the Board for approval of each clinical facility prior to use.

Correction #1 This violation has been corrected (-Bello-Jones 6/18/2009)

Violation #2 Section 2527 (b)

“A school shall report to the Board within ten days of the termination of a faculty member”.

Correction #2

At the time of the Bello-Jones document of June 18, 2009 this violation had not been corrected in total. A more detailed procedure was submitted as requested. According to Doreen Tan VN Director during this period ; the resolution of this request was handled via e-mail to the satisfaction of the Consultant Dr.. Powell. However to ensure that the issue is resolved a written policy has been attached to this document . **(See WJI attachment II)**.

Violation #3

Section 2534 (d) For supervision of clinical experience, there shall be a maximum of 15 students for each instructor.

Correction #3 -This violation has been corrected (Bello-Jones 6/18/2009)

Violation #4

Section 2527 (a)

“The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not accreditation will be continued”.

Corrections #4

“This violation has been corrected. (6/18/09-Bello-Jones)

Violation # 5

Section 2527 (c)

A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of accreditation or provisional accreditation.

Correction #5 “ This violation has been Corrected” (Bello-Jones-6/18/2009)

Violation 6

Section 2530(I)

“The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.....

Violation #6 is discussed in detail below as Section 3.0

Section 3.0

NCLEX Licensure Examination Pass Rates –Variance of the Program’s pass rates from the State’s average.

The Board, Administration, Faculty and Staff of Walter Jay M.D. Institute(HC) are all acutely aware of the emergent nature of full compliance with Section 2530 (I) and have taken decisive steps in addressing this violation. .

Historical Background

Since the inception of the Walter Jay M.D. Institute there have only been two graduating classes, 2007 and 2008. All Students who have taken the exams during the last eleven (11) quarters either graduated in the Class of 2007 or 2008, that is two or three years ago. The next class to graduate will not occur until September 2010. It is the first class to be admitted after WJI was notified of provisional accreditation.

Correlation between Passage Rate and School Stability:

Based on the statistics presented students graduating in the first class, 2007 had a passage rate of 65% of the class (while this was an eleven point variance from the State’s annual average passing rate) it stands in stark contrast to the passage rate of students in the Graduating Class of 2008 during which time the program was not fiscally or administratively stable thus impacting the quality of the preparation and education the students received.

We are still being saddled with the results of this organizational instability as students from this era continue to take the NCLEX exam with poor results. During the last four quarters a total of twenty of these students from the 2007 and 2008 era took the Boards for the first time. The performance of these students after waiting two or three years after graduating from their VN program was dismal as could be expected. Since retention of knowledge is lost after any training program and must be refreshed through some form of *Knowledge Retention Strategy*.

“Current research clearly documents that in as little as three weeks following a training event, an employee’s ability to recall and apply new knowledge or skills is less than 20 percent. Stated differently, employees will lose more than 80 percent of the information they were provided in a training program.” (Lindsay Edmonds Wickman, May 2008)

While this study is related to an employee training program it is on point as it relates to students in a VN Program.

Corrective Plan to Address Section 2530 (I)

Students Graduating 2007-2008

The program was notified of the violation of Section 2530 (1) in formal communication from the Board in 2008 five weeks before the 2008 class graduated leaving little time to make impactful intervention. Meaningful intervention was also hampered by the inability to obtain information about student's progress, passage rates and placement from the previous VN Director. The program which had during this period fallen under the leadership of a new director Doreen Tan who tried to make some meaningful impact by taking the following action to improve NCLEX Licensure Examination Pass rate..

Action Plan as initiated for 2007-2008 Graduates:

The WJI staff has been making a concerted effort to follow-up with the 2007 LVN class to provide tutoring and test taking support, offer NCLEX review assistance and to verify status. Students from Graduating classes of 2007 and 2008 were tracked and invited to return to campus for tutoring and test taking support and NCLEX review at no cost to the student. The Response from students was less than favorable only approximately 15% of students affected actually returned to take advantage of the support services offered.

WJI continues to take great interest in locating and supporting 2007 and 2008 LVN graduates to success. Activities by the Placement Director and Student Adviser to once again contact these students and offer them support system services is taking place (See Strategic Plan for future plans and strategies).

Students Graduating September 2010

NCLEX –PN Licensure Preparation Activities:

Students in the upcoming graduating class have been positively impacted by the following changes relative to the NCLEX –PN Licensure Examination which was initiated late in 2009.

Action Plan initiated for September 2010 Graduates Exam Preparation

- 1.0 Students are testing weekly (starting with Module 2) using the ATI program to prepare for NCLEX. *
- 2.0 Students are required to pass an NCLEX-style exit exam before graduating.
- 3.0 Two ATI Seminars taught a virtual on-line computer program and by an ATI Live

Review Instructor are scheduled for October 15-17, 2010 .

- 4.0 Passage of an ATI standardized NCLEX-style exam is required as a final exit exam.

Comprehensive Program Analysis and Plan of Correction dated March 1, 2010

A comprehensive plan addressing the following areas was submitted by the current VN Director Dr..Shirley Hiles, RN, DCH on March 1, 2010 (See Appendix for detailed Plan).:

- (a) Program admission (b) Terminal program (c.) Curriculum Objectives (d). Instructional Plan (e). Theory and Clinical Objectives for each course (f) Lesson Plans (g) Textbooks (h) Attendance Policy (I) Remediation Policy (J) Evaluations of Theory and Clinical Faculty (k) Evaluation of Theory Presentation (I). Evaluations of Clinical Rotations and Their Correlation to Theory Presentations (m) Evaluation of Student Achievement.

An area specifically affecting all future students is that of admission . Credible screening activities are paramount to selecting students who have the potential for excelling in the program . The following criteria has been excerpted from the above report and presented below.

Revised Admission, Screening & Selection Criteria

All in-coming students are required to take the following screening exams which along with the interview serve as predictors for program success.

- 1.0 Scholastic Level Exam (SLE) Wonderlic SLE test which requires a score of 21 to pass.
- 2.0 The Health Education Systems, Inc. (HESI) test, which includes math, English and comprehension skills. HESI is primarily for nursing programs and is approximately 2 ½ hours long. WJI previously accepted a 70% HESI score as passing, and has recently adopted a 75% score as passing for future enrollments..
- 3.0 All entering students must attend the mandatory prep classes for 4 weeks and pass with at least 75% before beginning nursing course work. The prep classes include Medical Terminology, Anatomy & Physiology, Calculations of Dosages and Critical Thinking.*

WJI/ Hamilton State College
MODIFIED STRATEGIC PLAN
2010-2015

Year 01 2010-2011

(Modified Version of Strategic Plan)

Strategic Goal 1.0 Recruitment, Admission and Retention/Persistence

Develop and implement a more comprehensive recruitment, admission and retention plan involving community high school students and counselors as a conduit for the WJI/Hamilton State College High School Feeder School Program.

Strategic Assumption:

Identifying and preparing a pool of qualified applicants early will result in a successful VN student .

Strategic Objectives:

Recruitment -

1. Establish a high school feeder program for WJI/HSC with local high schools by Jan. 2011.
2. Create a Saturday Academy for students from these high schools interested in Nursing as a career March 2011.

Admission

1. Complete activities related to creating more comprehensive admission screening tools with greater validity and reliability for predicting VN program success by October 2010.
2. Develop a criteria rubric to provide for a more credible and objective Rating/ Selection process by October 2010.
3. Build upon existing VN Pre-Program Preparation by adding a more thorough Diagnostic (testing) and Prescriptive Component for learning assessment by November 2010.

Retention/Persistence

1. Obtain available public and private grant funding to help underwrite a VN Nursing Support System which provides resources for learning and performance assistance, such as tutorial, virtual and self- paced learning, and Licensure examination preparation assistance by Dec. 2011.

2. Establish a Triad Mentorship Program to provide academic and clinical support to students enrolled in the program. The triad consist of the student, a student who will be soon to graduate and a faculty or other VN, RN volunteer meeting the mentorship criteria.

3. The institution will provide every admitted and needy student with access to private or in house loans, scholarships and grants and work/study opportunities. The institution is private and fiscally sound.

Strategic Goal 2.0 Passage on the NCLEX-VN Licensure Examination.

Achieve and maintain a Board Passage rate that is equal to or higher than the State's Average starting with October 2010 class.

Strategic Assumption:

Maintaining a passing rate that is equal to or surpasses the State of California average will not only meet the BNVTP Board Rules and Regulation but will add prestige and serve as an effective recruitment tool and alumni pride and source of funds.

Strategic Objective:

1. Admit a qualified pool of program applicants as determined by screening procedures and performance in the VN Pre-Program Preparation beginning Fall, 2010.
2. Test students weekly using ATI or another proven assessment tool (Starting module 2) ;
3. Utilize professional Review Instructors for both Live and Virtual Training.
4. Utilize resources from the Nursing Support System program to address individual test taking skills throughout the educational program.

STRATEGIC GOAL 3.0- PROGRAM CURRICULUM

Review, revise and update course curriculum while maintaining consistency with curriculum requirements as defined in Section 2531 and 2532 of the BVNT Rules and Regulations

Strategic Assumption:

Ongoing review of the program curriculum insures that the content reflects State of the Art information, technology, strategies and teaching modalities.

Strategic Objectives:

- 1.0 Review curriculum quarterly and update and revise as needed beginning 2010.

- 2.0 Hold a curriculum development workshop utilizing a curriculum consultant/Expert annually.
- 3.0 Provide electronic version of course syllabus to students beginning 2010 .
- 4.0 Utilize our Honorary Advisory Board for outside professional assessment, suggestions, ideas and innovations.

Goal 5.0 Faculty Recruitment and Development

Recruit , select and maintain a quality, dedicated, committed and passionate faculty who meet BVNPT requirements

Strategic Assumption:

A qualified committed faculty is necessary to effect positive and successful student outcome.

Strategic Objective 1.0 Faculty Recruitment

1. Develop a comprehensive Faculty recruitment plan that includes a list of reputable recruitment sources by October 2010.
2. Establish an effective interview screening system to be used prior to sending application to the BVNPT for Approval by October 2010.

Strategic Objective 2.0 Faculty Retention

1. Create a faculty incentive that includes sponsorship of continuing education both at the graduate and post graduate level beginning 2011.
2. Implement a credible performance evaluation system and Improvement plan that is appropriate for faculty assessment by March 2011.

Strategic Objective 3.0 Faculty Development

1. Develop and administer a Faculty Interest Survey to determine faculty educational and clinical need and interest by March 2011.
2. Apply for a CE Provider number to offer CE credits for special courses to be offered to WJI/HSC faculty and VN faculty at other schools in the area by April 2011.
3. Develop a cadre of courses, seminars and workshops to be offered in all curriculum content areas.

**Request by Walter Jay Institute/Hamilton State College
For Continuation of the Program**

1.0 Extend Provisional Accreditation .

Rational for request:

In consideration of the positive changes and corrections of all violations except Section 2530 and in light of the substantive steps being taken to address this violation we humbly request the BVNPT to extend provisional accreditation in accordance with Section 2526 (c) which states that "If the program has not met all requirements at the end of the initial provisional accreditation period, provisional accreditation may be extended if the program demonstrates to the satisfaction of the Board a good faith effort to correct all deficiencies".

Caveat:

The 2010 graduating class, which will begin to sit for the NCLEX-VN Examination Fall 2010 will be the first class to sit for the examination in two years. Based on the response on the ATI Comprehensive Practice predictor there is every indication that the passage rate will be high. Our goal is that all qualified graduates will take and pass their examination within the next three to six months.

2.0 Allow Admission Of A New Class

Rationale for Request:

Pursuant to a BVNPT approval for a new class granted in December 2009 WJI has begun recruitment and admission activities. This occurred long before the consultant's memo of August 13, 2010 advising that the Program hold off admitting a new class until after the 9/16/10 Board meeting .

Although WJI/HSC halted admission to the formal VN program 15 students had already begun the *VN Preparation for Success Program (VNPSP)* with the hopes of being admitted to the WJI –Hamilton State College LVN Program this Fall. It would be extremely unfortunate if these students were not allowed to enter the program.

We are requesting that WJI/HSC be allowed to begin a new class with smaller Numbers: (15-20) for one program period. This will allow us to provide the following:

- (a) Smaller teacher/student ration in both theory and clinical practicum
- (b) Allow us to implement a successful Triad Mentorship Program
- (c) Offer more intensive 1:1 tutorial
- (d) Provide greater resources for NCLEX-VN preparation

IMPACT OF NOT ALLOWING CONTINUING PROVISIONAL ACCREDITATION

There are obviously grave consequences to our institution and students if the program is not allowed to continue.

1.0 Adverse Impact on the Graduating Class of 2010

- (a) The Students graduating September, 2010 could be adversely impacted should the program completely lose it's accreditation. Admission to higher education nursing programs requires graduation from an accredited school in order to qualify for placement credit.
- (b) Positive BVNPT board discretion is needed for students to take the NCLEX-VN Licensure Examination.

2.0 Wasted Resources

All of the resources currently committed and currently being expended insure a more competent student through the *VN Preparation for Success Program* VNPSP would be wasted.

3.0 Acquisition of Grant Funds

Securing public and private grant funds for a VN Nursing Support System would be impossible.

4.0 Implementation of New Program Strategic Plans

Strategic Plans for a Community High School and Adult Re-entry program could not be implemented.

We are assured that if the BVNPT allows us to continue the program will be exonerated by the performance of our September 2010 graduates NCLEX-VN Licensure Test Scores and the implementation of strategic goals and plans relative to all aspects of the program will result in a "VN Flagship Program" that the school ,community ,State and Board can be proud of.

Thank you for your reconsideration of WJI/Hamilton state College Provisional Accreditation status.

Respectively Submitted:

Eunice G. Walker, RN, MSN, JD –In-Coming VN Program Director



Shirley Hiles, RN, DCH -Out-going VN Program Director



Steve Kim , President ,and Campus Manager Hamilton State College



WJI/HSC ATTACHMENT I
WJI RESPOSE TO CITED VIOLATIONS



Walter Jay M.D. Institute, an Educational Center

501 Shatto Place Suite #120, Los Angeles CA 90020 Office (213) 388-1369 Fax (213) 388-1338

January 15, 2009

Cheryl Anderson
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Ms Anderson,

The following is a description of the violations; with the corrective measures taken to ensure that such violation will never occur in future under the leadership of the Program Director, Doreen Tan.

Violation # 1 section 2534(a) states:

“Schools shall apply on a form provided by the Board for approval of each clinical facility prior to use.”

Corrective Measures Taken: All current clinical facilities used for rotation has been approved by the BVNPT. The following Facilities used during the rotation are:

- 1) City of Angels: Updated Approval: 08-14-2008.
- 2) Hollywood Presbyterian Medical Center: Approved: 08-21-2008
- 3) Integrated Nursing & Rehab Care of Glendora: Updated Approval: 10-16-2008
- 4) Los Angeles Medical Center (Wilshire Blvd): Approved: 08-18-2008
- 5) Olympia Convalescent Hospital: Updated Approval: 10-20-2008
- 6) Pacific Alliance Medical Center: Updated Approval: 08-14-2008
- 7) Temple Community Hospital: Updated Approval: 07-08-2008
- 8) Los Angeles Medical Center (Westlake Blvd): Approved: 10-17-2008
- 9) Los Angeles Medical Center (Soto St): Approved: 08-14-2008

**** Violation # 2 section 2527(b) states:**

“A school shall report to the Board within ten days of the termination of a faculty member.”

Corrective Measure Taken: Faculty members that had been terminated were informed via email within ten days as per vocational nursing practice act.

**** Violation # 3 2534(d) section states:**

“For supervision of clinical experience, there shall be a maximum of 15 students for each instructor.”

Corrective Measures Taken: I have been compliant within the allowed ratio of each facility approved by the Board. The clinical facilities that were utilized are:

1. City of Angels: Ratio 1:15
2. Hollywood Presbyterian Medical Center: Ratio 1:10
3. Los Angeles Medical Center (Soto St): Ratio 1:6
4. Los Angeles Medical Center (Wilshire Blvd) : Ratio 1:15
5. Olympia Convalescent Hospital: Ratio 1:10
6. Integrated Rehab of Glendora: Ratio 1:15
7. Pacific Alliance Medical Center: Ratio 1:10
8. Temple Community Hospital: Ratio 1: 10

**** Violation # 4 section 2527(a) states:**

“The Board shall require such reports by school and conduct such investigation as necessary to determine whether or not accreditation will be continued.”

Corrective Measures Taken: All faculty members' cell phone numbers were submitted to the Board when the faculty members were assigned to the clinical sites.

1. Noella Barb: 909 831 4259
2. Al Paggao: 626 966 8880
3. Ruth Tistoj: 562 316 6133
4. Dana Martin: 562 754 1288
5. Deanne Canieso: 818 726 4213
6. Gloria Juarez: 323 513 3093
7. Darlene Andres: 562 447 9777
8. Doreen Tan: 626 825 2491
9. Myra Paguia: 562376 0662
10. Elizabeth Ngassa 714 472 7120 (terminated on 09/26/08)
11. Benjamin Espinoza 323 559 1991

**** Violation # 5 section 2527 (c) states:**

“A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of accreditation or provisional accreditation.”

Corrective Measures Taken: A list of student/facility clinical assignment were submitted truthfully and accordingly with cell phone numbers of each instructor provided from July 2008 to October 2008.

**** Violation # 6 section 2532 states:**

“The course in vocational nursing shall consist of not less than 1530 hours or 50 semester units, and may be given on either a full-time or part-time basis.”

Corrective Measures Taken: A monthly report(July 2008, August 2008, September 2008, October 2008, November 2008) has been submitted for each affected student, and completion of remediation has been submitted for each affected student accordingly.

All the violations that had occurred before I had taken the position as the Program Director has been corrected with measures taken to prevent any future violations.

Thank you,
Much Appreciated,

Doreen Tan RN BSN PHN
Director of Nursing

Name and Phone number of the Approved Clinical Facility:

- | | |
|--|---------------|
| 1. Integrated Nursing Rehab of Glendora (sub-acute/ Psych) | 626-331 0781 |
| 2. Olympia Convalescent Hospital (sub-acute) | 213-487-3000 |
| 3. City of Angels Hospital (Acute/Psych) | 213-989- 6100 |
| 4. Pacific Alliance Medical Center (Acute Facility) | 213-683 9354 |
| 5. Temple Community Hospital (Acute Facility) | 213-382-7252 |
| 6. Hollywood Presbyterian Medical Center (OB) | 213-413-3000 |
| 7. Los Angeles Medical Center (Wilshire Blvd: Peds) | 213 483-9209 |
| 8. Los Angeles Medical Center (Soto St : Peds/OB) | 323-266-6730 |
| 9. Los Angeles Medical Center (Westlake : OB) | 213 483-9901 |

Please complete the following Enrollment Data Table for all classes currently enrolled and for those that are proposed.

ENROLLMENT DATA			
CLASS DATES		#Students Admitted at time of class start	#Students who are still in the class
Date class started or will start	Date class will Complete		
May 02,2006	July 06,2007	39	Graduated: 31 in July 2007
Aug 08,2007	Nov 07.2008 Day Class	45	Graduated 41 in Nov. 2008
Aug 08, 2007	Nov 07,2008 Evening Class	45	Graduated 44 in Nov. 2008
Request Replacement Feb. 12, 2009	Expected April 25, 2010	50	Pending class approval from BVNPT

Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Use data for your faculty and facilities that will accurately document the status on the first clinical day for your proposed students.

School: Walter Jay MD Institute
Tentative Start Date: Mar 28, 2009 – May 24, 2009

[illegible]

Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Use data for your faculty and facilities that will accurately document the status on the first clinical day for your proposed students.

School: Walter Jay MD Institute

[illegible]

Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Use data for your faculty and facilities that will accurately document the status on the first clinical day for your proposed students.

Tentative Start Date: Sept 10, 2009 – Jan 10, 2010

School: Walter Jay MD Institute

[illegible]

Complete for all currently enrolled and all proposed students.

Tentative Start Date: Jan 14, 2009 – Apr 25, 2010

[illegible]

**Maternity/Pediatric Rotation
Clinical Rotation Tracking Form (Module 4)**

	Week 1-2	Week 3-4	Week 5-6	Week 7-8	Week 9-10	Week 11	Week 12	Week 13-14	Week 15
Students 1-10	Pacific Alliance Medical Center - OB Rotation	Pacific Alliance Medical Center:OB Rotation	Los Angeles Medical Center, Wilshire - Pediatric	Los Angeles Medical Center, Wilshire: Pediatric					
Students 11-20	Los Angeles Medical Center, Soto - OB/Ped	Los Angeles Medical Center: Soto OB/Peds	Los Angeles Medical Center: Soto OB/Peds	Los Angeles Medical Center: Soto OB/Peds					
Students 21-30					Los Angeles Medical Center: Soto OB/Peds	Los Angeles Medical Center: Soto OB/Peds	Los Angeles Medical Center: Soto OB/Peds	Los Angeles Medical Center: Soto OB/Peds	
Students 31-40	Los Angeles Medical Center, Wilshire - Pediatric	Los Angeles Medical Center, Wilshire - Pediatric	Pacific Alliance Medical Center - OB Rotation	Pacific Alliance Medical Center - OB Rotation					
Students 41-50			Los Angeles Medical Center, Westlake - OB	Los Angeles Medical Center, Westlake - OB	Los Angeles Medical Center, Wilshire - Pediatric	Los Angeles Medical Center, Wilshire - Pediatric			

[illegible]

BVNPT

Written Plan to Improve NCLEX-PN® Exam Pass Rates

Doreen Tan, Director of Vocational Nursing
Prasanna Silva, President and COO

11/30/08

was later confirmed that Ms. Joseph had moved over 150 miles from the WJI campus and there opened her own Nursing school.

It was apparent that there was a lack of effective communication between the previous nursing director and administration. It was duly noted that repeated attempts were made to gain information about student progress, exam passage rates and placement without response. As the administrative Nursing expert, the DON was indisputably territorial and resisted providing information for various WJI agency reporting requirements. Regrettably, the information provided to administration by Ms. Joseph was incorrect and there was no oversight in place to confirm the information she reported. In May of 2008, when the issues were clearly identified and no evidence was presented, a significant recruiting effort for a new DON was launched. Ms. Joseph was terminated on July 7th, as soon as a qualified and reputable replacement was hired.

The new Director of Nursing, Doreen Tan, RN, BSN, PHN, was recruited and hired effective July 14, 2008. In Ms. Tan's report to the President and School Director, it was agreed that the curriculum and daily lesson plans utilized by WJI and approved by the advisory board were effective and fulfill the requirements of the California state nursing board. There was no need to alter the curricula.

The admissions process was studied and it was determined that the department and its processes needed revision to insure that the best mix of potentially successful applicants are selected for enrollment. WJI enhanced the interview process as the prior interview was too brief and autonomous. More administrative input is necessary to assess prospective students' motivations, capabilities, and potential success to train and license as a vocational nurse over a 2-year period.

WJI had no dedicated placement/post program professional assigned on a full-time basis. With a better understanding of the lengthy post program process for VN licensure, tracking and placement, it was determined that a full time professional is necessary to develop and implement student success services to include all post program monitoring. The President quickly budgeted for the additional staff member and launched recruitment. A well qualified Placement Director reported for duty on October 23rd.

AGGRESSIVE STRATEGIES TO RAISE PASS AND PLACEMENT RATES

WJI assembled all of the input from its internal response team and any other issues identified in the process. The results culminate in the WJI Student Success

OPENING STATEMENT

WJI has recognized that improvements are required, particularly after the introduction, initiation and operation of the first Vocational Nursing program class. This program offering requires nuances particularly necessary for VN successful outcomes.

As a result of an intense analysis, WJI has made substantive changes in operations to eliminate the deficits and raise the standard of quality of vocational nursing education offered WJI.

ADMISSIONS STANDARDS - New or changed elements

- ✓ New HESI Examination
- ✓ Increased HESI Minimum Scoring from 70% to 75%
- ✓ Interview Restructuring
- ✓ Director of Nursing now does one-on-one student interviews
- ✓ Director of Placement now interviews to review post program responsibilities and assess student motivation for success
- ✓ Financial planning includes review of post program financial responsibilities
- ✓ School Director, Director of Nursing and Placement Director convene for final approval of new enrollments

STAFF/INSTRUCTIONAL METHODOLOGY - New or changed elements

- ✓ Replaced Director of Nursing
- ✓ Terminated 2 Instructors
- ✓ Introduced new standards for staffing of VN program
- ✓ Hired 2 new instructors
- ✓ Reassigned 2 Instructors from theory to clinical duties
- ✓ DON conducted instructor training
- ✓ Implemented new teaching methodologies
- ✓ Considerations for professional memberships for DON and instructional staff
- ✓ Implemented mandatory homework assignments
- ✓ Mandatory, regularly scheduled makeup hours program
- ✓ Regularly scheduled, optional tutoring sessions
- ✓ Doubled computer laboratory from 12 to 24 computers
- ✓ Regularly scheduled, computerized and supervised 1-hour exam review weekly and NCLEX preparation exam every 4 weeks
- ✓ Developing preparatory and advance orientation program

EXAM PREPARATION - New or changed elements

- ✓ New, regularly scheduled NCLEX review program by Professional
- ✓ New routines for tracking and monitoring NCLEX preparation and passage
- ✓ Actively assisting LVN graduates in post-graduate application processes to the BVNPT
- ✓ Aggressive follow-up with prior graduates
- ✓ Hosting individual placement meetings with current students and recent graduates to evaluate and better serve their exam preparation and placement needs until licensure
- ✓ Posting a Student Success Calendar with WJI activities designed to assist students for adequate planning

POST PROGRAM - New or changed elements

- ✓ New dedicated Placement Director hired to supervise student services
- ✓ New Student Success Strategies Plan and Completion and Placement Timeline
- ✓ New tracking system for graduates in post program status
- ✓ New student inter-active incremental placement program

In conclusion, WJI has developed, initiated and implemented an aggressive corrective action plan that we are confident represents the WJI written plan for improving NCLEX-PN® pass rates. Over the next 9 months, WJI is confident that pass rates will exhibit successful outcomes.

WJI INTERNAL ASSESSMENT

WJI is acutely aware of the importance of NCLEX preparation, review, scheduling and pass rates. In fact, because the original Director of Nursing (DON), Nikki Joseph, was well qualified and networked, she assumed total responsibility for Vocational Nursing student success. The DON gave WJI her complete assurances that she could successfully direct the Vocational Nursing program, conduct NCLEX reviews and test preparation; and that NCLEX test scores would be satisfactory.

The WJI Response Team had already identified what they believed to be one of the major problems of the Vocational Nursing Program: the program DON. Ms. Joseph was situated only ten miles from the school when originally hired. However, earlier this year, there was great suspicion, based on hearsay, which

Strategy (**Exhibit 1**), an evolving plan of action to ensure student success from Admission to Placement and thereafter if needed by graduating students.

The Strategy identifies barriers to success and addresses potential solutions. The strategy is intended to identify solutions to assist students throughout the program while empowering them to maintain their educational and career objectives.

The administration and staff at WJI will be challenged to manage each individual student's success from beginning to end by providing more information during admissions, monitoring classroom performance more closely, offering multiple methods of training and test preparation assistance and maintaining contact post graduation. The Completion and Placement Timeline (**Exhibit 2**) was developed as a tool to offer students a "picture" of the success strategy. It will also be utilized to monitor and track each student's progress through the timeline for program and post program activities. Student success incentives are being developed to acknowledge achievements at various benchmarks in the timeline to motivate students throughout the program. Also included in **Exhibit 2** is the current Tutoring review schedule, implemented to offer students additional opportunities to strengthen their skills.

Oversight has been implemented. The School Director is well versed on Completion, Licensure and Placement policies, procedures and guidelines and is now primarily responsible for reporting. Weekly administrative meetings include student progress, completion, Licensure and placement reporting. Monthly reports are made by the School Director to the President, who monitors activity closely for immediate corrective action if necessary.

The first graduating Vocational Nursing class proved to be an acute learning experience for WJI. The Board can be assured that every possible effort is being made to address the deficiencies noted in the initial effort. WJI has initiated a major effort to locate and reconnect with graduates. Graduated students are being offered every WJI resource to encourage and motivate them to attain success. The President is optimistic, with new administration in place, who understand their accountability in meeting the tasks.

With a new Vocational Training class graduation in November 2008, the President, administration and staff of WJI are duly committed to the responsibilities to students and graduates, accepting that while policies and procedures delineate the standard operational processes, there may likely be additional challenges to be met to achieve the Goals in the Student Success Strategy.

ADMISSION STANDARDS

There are various steps that students have to take to be considered for enrollment. Two entrance exams are given to potential Vocational Nursing (VN) students. One is a Wonderlic SLE test which requires a score of 21 to pass. The second is the Health Education Systems, Inc. (HESI) test, which includes math, English and comprehension skills. HESI is primarily for nursing programs and is approximately 2-1/2 hours long. WJI previously accepted a 70% HESI score as passing, and has recently adopted a 75% score as passing for future enrollments. The HESI is more in-depth and a more comprehensive and detailed exam than WJI offered previously.

The admissions interview follows for potential students with acceptable test scores. For those continuing in the process, the applicants then go for the preliminary interview to review details regarding the Vocational Nursing program. Specifically, items reviewed include the program requirements, steps involved for completion, classroom session hours, and orientation documents (catalog, disclosures, policies, etc.). The goal of Admissions is to ensure that the student understands the program in order to be able to make an informed decision on whether to enroll.

WJI then evaluates any previous health care background education with some transferable aptitude. The WJI VN program does not require pre-requisites; however a typical LVN student will have some medical background, a sincere desire to help people and an extreme motivational ability to succeed in the program. Admissions main objective is to make sure that applicants have the desire to succeed are going to comprehend the information and stick with the program to licensure and placement.

WJI now includes the Director of Placement in the admissions process, to outline the student's post-program responsibilities and opportunities to work with her office to maintain a connection with the school for maximum results. This portion of the admission process addresses potential challenges between graduation and licensure and resources WJI makes available to students to continue to master information learned during the course while preparing to take the NCLEX exam. It also evaluates an applicant's history of goal setting and achievement, to assess their ability to succeed in the lengthy program. Key information gathering begins and an overview of placement responsibilities is reviewed.

WJI found a great improvement was noted when the new DON implemented a new element to the interview process. Specifically, the final interview with a student is given by the DON. The former DON encouraged

and utilized group admissions' interviews; whereas the new practice concerning applicant interviews by WJI's new DON is one-on-one.

WJI then refers qualified applicants to financial planning to complete the admissions process. A student's ability to manage finances throughout the program is a considerable part of a successful outcome. A prospective student is counseled in financial responsibilities at the onset, so that they can adequately prepare for the program. It is important to advise the student properly so that they can avoid potential financial anxiety during their educational program.

Most recently WJI adopted a "joint decision admissions process" between the DON, and the Placement Director and the School Director that makes the admissions' decision a more conservative act. They review the admissions file and discuss each student individually to make final enrollment decisions.

STAFF/INSTRUCTIONAL METHODOLOGY

WJI moved swiftly to replace its Director of Nursing (DON). The previous DON was released on July 7th and the new DON, Doreen Tan, RN, BSN, PHN, started on July 14th.

The new Director immediately launched an investigation into the operation of the Vocational Nursing Program (VN). The DON changed the process of hiring instructors in order to enhance the level of quality of instruction. She also terminated two instructors, and utilizing her new standards, approved by administration, hired two new instructors. Two other instructors were reassigned from theory to clinical instructional duties in order to have the properly qualified people in the appropriate positions. The new instructors were oriented in accordance with WJI policies.

The Director introduced new student disciplines creating mandatory homework assignments and objectives. She also required terminologies and critical thinking assignments based on each chapter that is lectured.

The DON also trained instructors in methodologies to engage students more during lecture to encourage participation and retention. She directed the instructors to maintain student attention by challenging them to think like licensed professionals, rather than like students.

The DON maintains close supervision of instructional activities and observes classroom management frequently. Adjustments are noted and improvements made as necessary.

The new DON implemented a mandatory schedule for makeup hours. Students that are lacking hours in specific Modules are required to participate. Instructors and students review a calendar that is created to show the days students are missing and what Module segments need to be made up to develop a makeup plan. The plan results are then printed in a standard format the DON implemented. Based on the student's makeup needs, individual packets are prepared for the student to use in the regularly scheduled makeup.

Additionally, the DON initiated optional 4-hour tutoring sessions. Students or graduates who need tutoring assistance can attend and receive additional instruction on relative topics and diagnosis. An example session topic is the respiratory system. At the end of the session, the students discuss diagnosis. Each Sunday the topic is a different system and related diagnosis.

Two of the instructors were re-assigned from Theory instruction to Clinical to best fit their capabilities. Unlike the previous DON who marginalized the VN program offering only the minimum requirements as promulgated by BVNPT, WJI now offers an enriched program adding to the effectiveness of the school curricula and instructional modes and materials.

Additionally, WJI doubled the size of the computer laboratory from 12 computers to 24 computers. One clear advantage to a larger computer lab is that now more students can come into the lab during daytime or evening hours to do assignments or research. As a result, the DON was able to implement a regularly scheduled, 1-hour, supervised test preparation exam each week. An NCLEX practice exam is now scheduled monthly. The objective is to provide an environment much like the NCLEX exam to help eliminate test anxieties and routinely develop student test taking skills.

LVN GRADUATES AND EXAM PREPARATION

The WJI staff has been making a concerted effort to follow-up with the 2007 LVN class to provide tutoring and test taking support, offer NCLEX review assistance and to verify status. WJI continues to take great interest in locating and supporting 2007 LVN graduates to success.

As noted, Ms. Tan, the new Director of Nursing (DON) has taken a very proactive approach to student success with the 2008 LVN class. We are pleased to report:

- Of the 87 starts, there were only 2 withdrawals throughout the program
- 76 of 85 students have completed the program
- the remaining 9 students continue in remediation and tutoring and are expected to complete the program

The previous DON suggested students secure the Live Scan, complete license applications and follow-up with the BVNPT on their own. Conversely, Ms. Tan has been actively involved in assisting students through the post-program licensing requirements to encourage completion of the processes and success:

- WJI hired a Live Scan contractor to provide Live Scan services on school premises for all LVN students just prior to graduation. All 85 students completed the Live Scan process required for the initial application for licensure
- Ms. Tan and the WJI administrative staff assisted students in completion the initial application for licensure
- Students were prepared in advance to pay the application processing fee. With advance notice, and encouraged by the group application submission, all 76 students were able to budget for and pay the fee.
- As a result, Ms. Tan packaged and mailed 66 graduate applications and fees on Monday, November 17th. The 10 remaining applications were mailed on Friday, November 28th. Applications for the 9 students expected to complete will be mailed shortly thereafter.

WJI hosted a two day NCLEX review on Oct. 25 and 26th with Dr. Lily Lee, RN, PhD, DCH (<http://shinymedical.com/About%20Dr.Lee.htm>), a respected NCLEX review professional. This review was scheduled for students that haven't yet passed the NCLEX. Graduates were contacted and encouraged to attend the review at no cost. It is provided for graduates as a refresher to motivate them to take or re-take the exam. It also represents a major effort by WJI to reconnect with graduates and provide them with the services they need to be successful in NCLEX examination and licensing.

NCLEX review by Professional will be on-going as we see a real value in this refresher opportunity. As a component of the preparation schedule, WJI includes staff coordination regarding scheduling, location, time, and any details that students can use to minimize stress and be adequately prepared for the NCLEX.

The previous DON left the students on their own to secure payment and schedule the NCLEX exam. In follow-up with former graduates, we identified the NCLEX exam fee as a barrier to success.

As a result, Ms. Tan worked with the financial assistance Director to develop a plan to secure the NCLEX exam fee from graduates. Once the graduate applications are processed and exam dates are made available, Ms. Tan intends to assist students in scheduling the exam at a convenient location and forwarding exam fees to the appropriate party. There will be no exam delays due to financial concerns for 2008 LVN graduates.

Graduates have been very receptive to Ms. Tan's hands-on, proactive approach to post program licensing requirements. This approach keeps graduates involved and in contact with the school throughout the process so that the WJI staff can actively implement post program student success strategies.

LICENSURE/PLACEMENT

WJI did not previously employ a dedicated placement professional. WJI recognized that a Placement Director was needed to provide dedicated assistance to graduate Licensure and placement assistance. Upon recognizing the consequences of the absence of a dedicated placement professional, WJI's President immediately launched a search for a qualified candidate.

Elida Gil de Montes, a well-qualified Placement Director, joined the team at WJI on October 23rd. She manages, and is assisted by, the Student Services Coordinator. Her experience in successful college placement at other institutions will be an asset to the students, staff and administration at WJI.

The Placement Director is implementing student success strategies geared toward a successful post program experience for students. She assists graduates in obtaining work in training related fields while awaiting for the NCLEX examination and licensure processing. She will also manage student services, developing student resources that can be made available to students throughout the program.

The Placement Director is introduced to new students during the admissions process. She is being introduced to current students, to prepare them for the post program months ahead. She is working closely with the School Director and Director of Nursing to manage the post program weeks efficiently and effectively to ensure student success.

WJI realizes that even in an industry where nurses are in tremendous demand there is a great need to structure a coordinated placement practice including the systematic and effective tracking of graduates to achieve successful and timely NCLEX test preparation and scheduling.

It is important to note that due to the length of the VN program, at 15 months, the last graduating class completed in August of 2007. As mentioned previously, WJI is making every effort to locate and reconnect with previous graduates to offer them success strategies and placement opportunities. WJI has initiated "skip tracing" for graduates that we have been unable to contact or locate by phone or mail, to introduce them to WJI's extended program for their benefit.

WJI graduated the 2008 VN program on November 6th. As indicated in **Exhibit 2**, the VN Student Success Completion and Placement Timeline, it could take 9 months (August 2009) to pass the NCLEX-PN exam, license and acquire verifiable placement in Licensed Vocational Nursing occupations for this graduating class. However, as noted on the timeline, the success strategy is being implemented for this class so that tracking will be more efficient and reporting will be more concise. Each individual student will be tracked by the Director of Placement coordinating with the Director of Nursing and the Student Services Coordinator. Primary activities will be noted on individual timeline spreadsheets for each graduate and secondary activities will be check listed.

For the recent 2008 LVN graduates, Ms. Gil de Montes conducted placement seminars on October 27th and October 28th. She has met each graduate individually to assess their personal and professional goals, provide resume assistance, industry contact information and employer references. **To date, she has interviewed 83 LVN graduates and has received 70 resumes for employment referral.**

The Student Success Completion and Placement Timeline for future VN students differ slightly, initiating coordination with the Director of Placement during the VN program. Additionally, tutoring and additional training opportunities will be offered throughout program.

The efforts of Ms. Gil de Montes, and her staff have also been well received by students, graduates and former graduates of WJI.

WJI STUDENT SUCCESS CALENDAR

The WJI Student Success Calendar (**Exhibit 3**) continues to evolve to accommodate students and graduates. Since the 2008 LVN class is completing, the calendar now includes:

- Student success activities
- Tutoring
- Exam/test preparation
- Professional NCLEX review
- Placement seminars
- Employer recruiting visits
- Graduation Services

The Student Success Calendar is posted on the WJI website for reference by students and graduates alike. Administration and staff look forward to adding activities monthly that encourage success and continued participation at WJI.

WJI ADMINISTRATIVE TRAINING

On November 12th, WJI hired a consultant to moderate an in service training for all administration, staff and instructors to discuss barriers to success. All WJI personnel took an active role in suggesting additional success strategy techniques that could be implemented in the classroom and by WJI's various departments. The training was designed to bring consensus to WJI as a team and to commit them all to student success as a means of defining their personal success at WJI.

Student success = staff success = administrator success = WJI success.

Various activities were discussed to create a theme of success throughout the Institute to develop a sense of accomplishment and to spotlight success. WJI personnel committed to the goals established in the Student Success Strategy.

WJI will conduct in-service training at least quarterly, focusing on "success" throughout 2009 to review outcomes, review steps taken to achieve improved outcomes and to revise the strategy as needed.

CLOSING STATEMENT

Walter Jay M.D. Institute (WJI) is pleased to report that the commitment among the WJI team is strong and unyielding. New administrators have implemented success strategies that have presented immediate results.

We are also pleased to report that students are receptive to the commitment to success at WJI and have participated and cooperated with significant changes made at the Institute for their benefit.

We understand that success is a journey, and that the WJI team may encounter challenges in achieving the success strategy goals. But the team is committed, and the President encourages the team to accept responsibility and accountability for their individual roles in the overall plan.

In conclusion, WJI has implemented an aggressive corrective action plan. WJI is confident that 2008 graduate exam passage rates will exhibit successful outcomes.

WJI/HSC ATTACHMENT II
Notice of Change in Accreditation
Bello-Jones 6/18/2010



June 18, 2009

Doreen Tan, B.S., R.N., Director
Vocational Nursing Program
Walter Jay, M.D. Institute
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Subject: Notice of Change in Accreditation Status

Dear Ms. Tan:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians on May 22, 2009, the status of the Walter Jay, M.D. Institute Vocational Nursing Program has been changed relative to provisional accreditation. Please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by **Friday, June 26, 2009**.

AREAS OF NON-COMPLIANCE [VIOLATION(S)]

This notice summarizes the current status of Board findings based on recent and prior communications identifying program violations. The violations identified relate to the program's non-compliance with requirements set forth in California Code of Regulations (CCR), Title 16, Article 5, Schools of Vocational Nursing.

Section 2534 (a) of the California Code of Rules and Regulations states:

"Schools shall apply on a form provided by the Board for approval of each clinical facility prior to use."

Violation #1: As specified in the consultant's report to the Advisory Committee dated September 2, 2008, the program assigned students to clinical rotations in facilities that had not been approved by the Board (see Attachment A).

Correction #1: This violation has been **corrected**. The program has proposed student clinical rotations at clinical facilities previously approved by the Board that are consistent with the Board-approved curriculum. Facility representatives have confirmed the sufficiency of clinical experience to facilitate students' achievement of approved objectives.

Section 2527(b) states:

"A school shall report to the Board within ten days of the termination of a faculty member."

Violation #2: As specified in the September 2, 2008, report, the program failed to notify the Board of the termination of multiple instructors (see Attachment A).

Plan of Correction #2:

This violation has **not** been **corrected**. On April 15, 2009, the consultant requested the director to develop and submit a process or procedure that would ensure Board notification within ten days of faculty terminations, thereby preventing reoccurrence of this violation. In response, the director submitted a document titled, "LVN Instructor Book Sign Out." The submitted document is completed by program instructors upon receipt of program materials. It does not address procedures to be completed by the program upon termination of faculty.

Section 2534 (d) states:

"For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."

Violation #3: The September 2, 2008, report states that the program assigned sixteen (16) students in Term II to Temple Community Hospital. One (1) instructor and one (1) teacher assistant were assigned. Additionally, the program assigned sixteen (16) students in Term II to Integrated Nursing and Rehabilitation Center. One (1) instructor and one (1) teacher assistant were assigned (see Attachment A).

Correction #3: This violation has been **corrected**. The program has hired five (5) experienced instructors. Each Teacher Assistant is assigned to assist an approved and experienced instructor in the skills lab and clinical area only.

Section 2527 (a) states:

"The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not accreditation will be continued."

Violation #4: As stated in the September 2, 2008 report, the consultant requested the program to submit documentation of the faculty/student assignments for all currently enrolled students for each term of the program. Cell phone numbers for each instructor were also requested. The program failed to submit the requested documents (see Attachment A).

Additionally, the program failed to submit the required annual report due October 1, 2008.

Correction #4: This violation has been **corrected**. The program has submitted Faculty/Student Clinical Assignments for each term in the program. On May 6, 2009, the program submitted the 2006/2007 Annual Report that was due October 1, 2008.

Section 2527(c) states:

"A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of accreditation or provisional accreditation."

Violation #5: As stated in the September 2, 2008, report, the assigned consultant identified material misrepresentations of fact in information and documents submitted to the Board on April 9, 2008. These misrepresentations addressed the assignment of instructors and teacher assistants and the use of teacher assistants to provide theory instruction in violation of section 2530 (d) (see Attachment A).

Correction #5: This violation has been **corrected** (see Correction #3).

Section 2530(l) states:

"The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

(1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation."

Violation #6: The program's annual average pass rate has been more than ten (10) percentage points below the state average annual pass rate for six (6) consecutive quarters. Those pass rates are set forth in the following table.

Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate
Oct – Dec 2007	76%	65%
Jan - Mar 2008	75%	50%
Apr – Jun 2008	74%	48%
Jul - Sep 2008	74%	44%
Oct – Dec 2008	73%	11%
Jan – Mar 2009	72%	35%

Based on this data, the program failed to meet the annual average pass rate requirements.

REQUIRED CORRECTION(S)

1. In order to return to full accreditation status, the Walter Jay M.D. Institute Vocational Nursing Program must correct Violation #2 and Violation #4 within two (2) weeks of the date of this notice. Additionally, the program must bring its annual average pass rate on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX/PN®) to no more than ten (10) percentage points below the State annual average pass rate by **September 11, 2010**.
2. The program must prepare and implement a written plan to improve its pass rate and make modifications to the plan as necessary based on the success or failure of the actions taken. That plan must include a comprehensive analysis of the program, specific actions that will be taken to improve program pass rates, and timelines for expected results. The following elements must be addressed in the analysis.
 - a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.
 - h. Textbooks.
 - i. Attendance Policy.
 - j. Remediation Policy.
 - k. Evaluations of Theory and Clinical Faculty.
 - l. Evaluations of Theory Presentations.
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - n. Evaluation of Student Achievement.
3. The program must show documented progress by submitting a follow-up report in 10 months, but no later than **March 1, 2010**, evaluating the effectiveness of any corrective actions taken by each element listed in number 2 above.
4. The program must comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2525.

Failure to take these corrective actions may cause the Board to revoke the program's accreditation. In the event additional violations of the accreditation standards are identified, such violations may result in further corrective action or revocation of provisional accreditation.

FUTURE BOARD ACTION

Your program will be placed on the **May 2010** Board Meeting agenda for reconsideration of your accreditation status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) by the fifteenth day of the second month prior to that Board meeting.

OTHER IMPORTANT INFORMATION

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: The program must request Board approval prior to the admission of each class.

In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board regulations.

The program may no longer advertise that it has full accreditation, and should take steps to correct any ongoing advertisements or publications in that regard.

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional accreditation is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at www.bvnpt.ca.gov.

Should you have questions, please do not hesitate to contact the Board.

Sincerely,

TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer

Enclosure

cc: Board Members

**WJI/HSC ATTACHMENT III
CORRECTION
SECTION 2527 (B)
FACULTY TERMINATION**



Walter Jay M.D. Institute, an Educational Center

Policy and Procedure

Correction #2

Section 2527 (b) A school shall report to the Board within ten days of the termination of a faculty member.

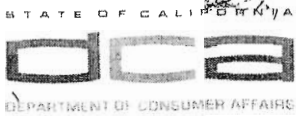
The rule of that statement and regulation is clear, concise and understandable. The policy of termination will be implemented by the Program Director with the support and assistance of the Campus Director, his staff and the Academic Dean of the institution. The continued employment of individual faculty members after hiring is based upon Program needs and evaluation of performance as qualified and committed educators who can and do communicate effectively with the students, their fellow faculty team members and the staff of the institution.

Evaluation of that performance will be made by the Program Director and academic Dean by weekly evaluation of effective teaching as recognized by them from personal observation and inter-faculty critique and the weekly performances of students on Program exams and standardized Nclex-style examinations of the material covered the previous week.

1. Termination shall be either voluntary by the individual through receipt by the institution of a written letter of resignation or involuntary pursuant to a letter of termination emanating from the Campus Director and approved by the VN Program Director.
2. Termination becomes effective upon a date certain as requested through voluntary resignation and compliance with sign out procedures by the terminated faculty member as determined by the Campus Director. Immediately following sign out, if not before, the Board will be notified of the faculty members termination (absolutely within ten days as required by statute.)
3. Termination of a faculty member following involuntary procedures will be effective as of the date contained in the involuntary letter of termination. The Board will be notified within 10 days of that termination date if not before.

The Program Director for the VN Program as well as the Campus Director will have shared primary responsibility for insurances of compliance with all statutes, policies and procedures regarding termination of a faculty member.

Agenda Item #15.F. – Attachment C



STATE AND CONSUMER SERVICES AGENCY : ARNOLD SCHWARZENEGGER, GOVERNOR
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7866 Web www.bvnpt.ca.gov



September 28, 2010

Shirley A. Hiles, B.S. R.N., Director
Vocational Nursing Program
Walter Jay M.D., Institute, AKA Hamilton State College
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Subject: Board Meeting Follow – Up

Dear Ms. Hiles:

The Board of Vocational Nursing and Psychiatric Technicians (Board) considered the consultant's report relative to ***Walter Jay M.D. Institute, also known as Hamilton State College, Vocational Nursing Program – Reconsideration of Provisional Accreditation***, at its September 16, 2010 meeting.

The following decisions were rendered by the Board.

1. Deny Walter Jay M.D. Institute Vocational Nursing Program's request to admit 30 students into a full – time class commencing December 15, 2010, with a projected graduation of December 16, 2011.
2. Revoke the provisional accreditation of the Walter Jay M.D., Institute Vocational Nursing Program, also known as the Hamilton State College Vocational Nursing Program, effective September 16, 2010.
3. Remove the program from the *List of Accredited Vocational Nursing Schools*.

California Code of Regulations Section 2526.1(h) specifies, "A program that is removed from the Board's list of accredited programs subsequent to Board action based on the program's non-compliance with applicable regulations shall not reapply to establish a vocational nursing program for a minimum period of one calendar year." Pursuant thereto, please be advised that Walter Jay M.D. Institute Vocational Nursing Program, also known as the Hamilton State College Vocational Nursing Program may not reapply to establish a vocational nursing program prior to September 16, 2011.

Please contact the Board should further clarification be needed.

Sincerely,

CHERYL C. ANDERSON, M.S., R.N.
Supervising Nursing Education Consultant

cc: Steve Kim, Owner
Campus Director

Agenda Item #15.F. – Attachment D



Walter Jay M.D. Institute,
an Educational Center

BVNPT

2010 OCT -4 PM 3:41

DBA

Hamilton State College

501 Shatto Place Suite #120, Los Angeles CA 90020 Office (213) 388-1369 Fax (213) 388-1338

DATE: September 23, 2010

TO: John Vertido, President & Members of The BVNPT
Teresa Bello-Jones, RN, MSN, JD, Executive Director
Board of Vocational Nurses & Psychiatric Technicians
2535 Capitol Oaks Drive
Sacramento CA 95833

FROM: Eunice Walker RN, MSN, JD, In-coming VN Director
Steve Kim, President & Campus Director
Walter Jay MD Institute /Hamilton State College

RE: Board's Decision -Reconsideration of Walter Jay MD Institute
Provisional Accreditation

Dear Mr. President, Members of the Board and Madam Executive Director:

We appreciated having had the opportunity to present our case for Reconsideration of Provisional Accreditation before the Board at your 9/16/10 meeting in Los Angeles.

Because we believe that our oral presentation before the BVNPT was burdened by the concern for time, (WJI was the last of eleven presenters and seven hours of presentations); we feel that further clarification of the following issues is necessary.

Issue I

Clarification of the final vote by the Board as it Pertained to Item #14 of the Board's Agenda (Walter Jay M.D. Institute- Reconsiderations of Provisional Accreditation).

We are still not clear on the tally for the final vote by the Board. Could you please clarify the breakdown of yeas, nays and or absentees? There is also confusion as to which motion was on the floor at the time of the vote. If there are minutes or other records of the proceedings we would appreciate being directed to this source.

Agenda Item #15.F. – Attachment E



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER, GOVERNOR
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7866 Web www.bvnpt.ca.gov



October 16, 2010

Eunice G. Walker, J.D., M.S.N., R.N.
Walter Jay M.D., Institute, AKA Hamilton State College
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Subject: Reconsideration of Board Decisions

Dear Ms. Walker:

The Board of Vocational Nursing and Psychiatric Technicians (Board) acknowledges receipt of your correspondence dated September 23, 2010, and received October 4, 2010. Specifically, you request reconsideration of the Board's decisions of September 16, 2010, relative to the ***Walter Jay M.D. Institute, also known as Hamilton State College, Vocational Nursing Program.***

Your request for reconsideration has been forwarded to Board Members. The Board is scheduled to consider a report relative to that request on February 25, 2011. Final decision(s) relative to the status of the program will be rendered by the Board. Please be advised that the Board's decisions may not be different, even if reconsideration is granted.

Please forward any additional information you wish considered no later than **Wednesday, December 1, 2010.**

Should further information be needed, please contact the Board.

Sincerely,

Cheryl C. Anderson

CHERYL C. ANDERSON, M.S., R.N.
Supervising Nursing Education Consultant

cc: Steve Kim, Owner
Campus Director

ISSUE 2

Good Faith Effort to Correct Deficiencies – Section 2530 (c) Provisional Accreditation -Vocational Nursing California Code of Regulations (Includes amendments through September 1, 2009)

According to Section 2526 (c)

The Board may place any program on provisional accreditation when that program does not meet all requirements as set forth in this chapter and in Section 2526. **If the program has not met all requirements at the end of the initial provisional accreditation period, provisional accreditation may be extended if the program demonstrates to the satisfaction of the Board a good faith effort to correct all deficiencies.**

Since this is WJI initial provisional accreditation period the question then becomes, how did the Board determine “Good faith effort”?
What standard or guidelines were applied to determine whether efforts by WJI did or did not meet to the Board’s satisfaction “Good Faith Effort “.

Are there written criteria or other documents containing such guidelines? If so it would be helpful to have this information. Especially, since we believed that we have made a “good faith effort “to correct deficiencies based on the activities below:

1. All Areas of Non-Compliance cited were corrected within the BVNPT timeframe as documented both by BNVPT (Attachment 2 –Boards Report) and WJI 9/7/10 response to the Board.

The **one Area** of Non Compliance (Violation) remaining is 2530(I).
Variance in NECLEX – VN Passage Rate.
To address this remaining violation the following activities were implemented.

- (a) Developed and implemented a written Plan to improve its pass rate and made modifications to the plan as necessary as directed the BVNPT. The document containing this plan was submitted by WJI in 1/15/09. A copy of this document was Included as an attachment to WJI 9/7/10 response to Consultant’s recommendations.
- (b) Developed and implemented new Admission Criteria which included the use of standardized assessments namely, The Admission Assessment Exam (HESI) and the Scholastic Level Exam (SLE). This change was implemented to ensure a more prepared pool of applicants that were more likely to complete the program and pass the NCLEX-VN Exam.

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ISSUE 3

No Opportunity to show results of Action Taken to Improve Pass Rate

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WJI at the least would have liked the opportunity to wait for these results. Especially since great effort and expense has gone into insuring that these students would have every chance of being successful on exam.

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ISSUE 4 Impact of BVNPT Decision

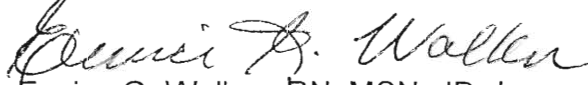
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4. Securing public and private grant funds for a VN Nursing Support System Program is impossible without a VN program in place.
5. The well equipped State of the Art facility created just for the VN program will lay waste.

While it is very obvious as to what will be **lost** by the Board's decision to revoke WJI's Provisional Accreditation however it is very harder to understand would could possibly be **gained** by this action.

Therefore we ask for special reconsideration and the opportunity to remedy past performance. Again we want to thank you for any reconsideration that the BVNPT may be willing to provide us and we look forward to your response regarding our issues and concerns.

Respectfully Submitted:


Eunice G. Walker, RN, MSN, JD- In-coming VN Director


Steve Kim, President and Campus Manager
WJI/Hamilton State College

Copies : Board Members:

- o Todd D'Braunstein - P.T. Member, Board Vice-President
- o Kevin Baucom - P.T. Member
- o Ling-Ling Chang - Public Member
- o Victor King - Public Member
- o Jessica Leavitt - Public Member
- o Mark Stanfield - L.V.N. Member

Agenda Item #15.F. – Attachment F



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945

Phone (916) 263-7800 Fax (916) 263-7859 Web www.bvnpt.ca.gov



January 13, 2011

Eunice G. Walker, J.D., M.S.N., R.N.
Director, Vocational Nursing Program
Walter Jay M.D., Institute, AKA Hamilton State College
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Subject: Reconsideration of Revocation

Dear Ms. Walker:

The Board of Vocational Nursing and Psychiatric Technicians (Board) is scheduled to reconsider revocation and the request to admit students into the **Walter Jay M.D., Institute, AKA Hamilton State College Vocational Nursing Program** on February 25, 2011.

On October 4, 2010, the Board received your correspondence (including attachments) relative to your requests. To ensure dissemination to individual Board members and relevant staff for timely consideration at the February 25, 2011 Board Meeting, please submit:

- Fifteen (15) copies of pertinent documents that you desire Board members to consider. Please remember existing statutes require that any document considered by the Board will become a public record. Accordingly, please redact all names of students.
- In addition, please provide information on a compact disc (CD) for Board use. Again, please remember to redact any student names prior to copying information onto the CD.

To ensure dissemination and review by Board Members prior to the meeting, the deadline for submission of the requested documents and the CD is **Friday, January 28, 2011.**

Although the primary purpose of this letter is to convey the Board's need for the copies, please be assured that, if timely submitted, any correspondence and attachments will be reviewed and, if appropriate, information submitted may be included in the report of the assigned consultant.

Please do not hesitate to contact the Board at (916) 263-7843 should you have questions.

Sincerely,

Cheryl C. Anderson

CHERYL C. ANDERSON, M.S., R.N.
Supervising Nursing Education Consultant

Agenda Item #15.F. – Attachment G



Hamilton College

Formerly
Walter Jay MD Institute

501 Shatto Place Suite #120, Los Angeles CA 90020 Office (213) 388-1369 Fax (213) 388-1338

DATE: January 26, 2011

TO: Cheryl C. Anderson, M.S., R.N.
Supervising Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oak Drive
Sacramento, CA. 95833

edu
BVNPT Received
on 1/28/11 with mc

FROM: Eunice G. Walker, RN, MSN, JD
Director, Vocational Nursing Program
Hamilton State College (Formerly) Walter Jay MD Institute
501 Shatto Place Suite #120
Los Angeles CA 90020

RE Reconsideration of Revocation

Ms. Anderson:

Attached please find the document submitted to the BVNPT on September 23, 2010 related to our request for reconsideration of the VN Program's Provisional Accreditation. The BVNPT's response dated October 16, 2010 acknowledged receipt of our request and indicated that the request would be considered at the February 25, 2011 BVNPT meeting.

In light of this response I am resubmitting the September 23, 2010 "Request for Reconsideration of the VN Program's Provisional Accreditation" document with the specified number of copies along with a compact disc. Thank you for the opportunity to send additional documents for consideration however, since there has not been any relevant program activity since "Revocation", there is no new or additional information to present at this time.

Sincerely:

Eunice Walker, RN, MSN, JD
Director, Vocational Nursing Program

cc: Steve Kim, Campus Manager



Walter Jay M.D. Institute,
an Educational Center

DBA

Hamilton State College

501 Shatto Place Suite #120, Los Angeles CA 90020 Office (213) 388-1369 Fax (213) 388-1338

DATE: September 23, 2010

TO: John Vertido, President & Members of The BVNPT
Teresa Bello-Jones, RN, MSN, JD, Executive Director
Board of Vocational Nurses & Psychiatric Technicians
2535 Capitol Oaks Drive
Sacramento CA 95833

FROM: Eunice Walker RN, MSN, JD, In-coming VN Director
Steve Kim, President & Campus Director
Walter Jay MD Institute /Hamilton State College

RE: Board's Decision -Reconsideration of Walter Jay MD Institute
Provisional Accreditation

Dear Mr. President, Members of the Board and Madam Executive Director:

We appreciated having had the opportunity to present our case for Reconsideration of Provisional Accreditation before the Board at your 9/16/10 meeting in Los Angeles.

Because we believe that our oral presentation before the BVNPT was burdened by the concern for time, (WJI was the last of eleven presenters and seven hours of presentations); we feel that further clarification of the following issues is necessary.

Issue I

Clarification of the final vote by the Board as it Pertained to Item #14 of the Board's Agenda (Walter Jay M.D. Institute- Reconsiderations of Provisional Accreditation).

We are still not clear on the tally for the final vote by the Board. Could you please clarify the breakdown of yeas, nays and or absentees? There is also confusion as to which motion was on the floor at the time of the vote. If there are minutes or other records of the proceedings we would appreciate being directed to this source.

ISSUE 2

Good Faith Effort to Correct Deficiencies – Section 2530 (c) Provisional Accreditation -Vocational Nursing California Code of Regulations (Includes amendments through September 1, 2009)

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Agenda Item #15.F. – Attachment H

June 18, 2009

Doreen Tan, B.S., R.N., Director
Vocational Nursing Program
Walter Jay, M.D. Institute
501 Shatto Place, Suite 120
Los Angeles, CA 90020

Subject: Notice of Change in Accreditation Status

Dear Ms. Tan:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians on May 22, 2009, the status of the Walter Jay, M.D. Institute Vocational Nursing Program has been changed relative to provisional accreditation. Please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by **Friday, June 26, 2009**.

AREAS OF NON-COMPLIANCE [VIOLATION(S)]

This notice summarizes the current status of Board findings based on recent and prior communications identifying program violations. The violations identified relate to the program's non-compliance with requirements set forth in California Code of Regulations (CCR), Title 16, Article 5, Schools of Vocational Nursing.

Section 2534 (a) of the California Code of Rules and Regulations states:

"Schools shall apply on a form provided by the Board for approval of each clinical facility prior to use."

Violation #1: As specified in the consultant's report to the Advisory Committee dated September 2, 2008, the program assigned students to clinical rotations in facilities that had not been approved by the Board (see Attachment A).

Correction #1: This violation has been **corrected**. The program has proposed student clinical rotations at clinical facilities previously approved by the Board that are consistent with the Board-approved curriculum. Facility representatives have confirmed the sufficiency of clinical experience to facilitate students' achievement of approved objectives.

Section 2527(b) states:

"A school shall report to the Board within ten days of the termination of a faculty member."

Violation #2: As specified in the September 2, 2008, report, the program failed to notify the Board of the termination of multiple instructors (see Attachment A).

Plan of Correction #2:

This violation has **not** been **corrected**. On April 15, 2009, the consultant requested the director to develop and submit a process or procedure that would ensure Board notification within ten days of faculty terminations, thereby preventing reoccurrence of this violation. In response, the director submitted a document titled, "LVN Instructor Book Sign Out." The submitted document is completed by program instructors upon receipt of program materials. It does not address procedures to be completed by the program upon termination of faculty.

Section 2534 (d) states:

"For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."

Violation #3: The September 2, 2008, report states that the program assigned sixteen (16) students in Term II to Temple Community Hospital. One (1) instructor and one (1) teacher assistant were assigned. Additionally, the program assigned sixteen (16) students in Term II to Integrated Nursing and Rehabilitation Center. One (1) instructor and one (1) teacher assistant were assigned (see Attachment A).

Correction #3: This violation has been **corrected**. The program has hired five (5) experienced instructors. Each Teacher Assistant is assigned to assist an approved and experienced instructor in the skills lab and clinical area only.

Section 2527 (a) states:

"The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not accreditation will be continued."

Violation #4: As stated in the September 2, 2008 report, the consultant requested the program to submit documentation of the faculty/student assignments for all currently enrolled students for each term of the program. Cell phone numbers for each instructor were also requested. The program failed to submit the requested documents (see Attachment A).

Additionally, the program failed to submit the required annual report due October 1, 2008.

Correction #4: This violation has been **corrected**. The program has submitted Faculty/Student Clinical Assignments for each term in the program. On May 6, 2009, the program submitted the 2006/2007 Annual Report that was due October 1, 2008.

Section 2527(c) states:

“A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of accreditation or provisional accreditation.”

Violation #5: As stated in the September 2, 2008, report, the assigned consultant identified material misrepresentations of fact in information and documents submitted to the Board on April 9, 2008. These misrepresentations addressed the assignment of instructors and teacher assistants and the use of teacher assistants to provide theory instruction in violation of section 2530 (d) (see Attachment A).

Correction #5: This violation has been **corrected** (see Correction #3).

Section 2530(l) states:

“The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

(1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation.”

Violation #6: The program's annual average pass rate has been more than ten (10) percentage points below the state average annual pass rate for six (6) consecutive quarters. Those pass rates are set forth in the following table.

Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate
Oct – Dec 2007	76%	65%
Jan - Mar 2008	75%	50%
Apr – Jun 2008	74%	48%
Jul - Sep 2008	74%	44%
Oct – Dec 2008	73%	11%
Jan – Mar 2009	72%	35%

Based on this data, the program failed to meet the annual average pass rate requirements.

REQUIRED CORRECTION(S)

1. In order to return to full accreditation status, the Walter Jay M.D. Institute Vocational Nursing Program must correct Violation #2 and Violation #4 within two (2) weeks of the date of this notice. Additionally, the program must bring its annual average pass rate on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX/PN®) to no more than ten (10) percentage points below the State annual average pass rate by **September 11, 2010**.
2. The program must prepare and implement a written plan to improve its pass rate and make modifications to the plan as necessary based on the success or failure of the actions taken. That plan must include a comprehensive analysis of the program, specific actions that will be taken to improve program pass rates, and timelines for expected results. The following elements must be addressed in the analysis.
 - a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.
 - h. Textbooks.
 - i. Attendance Policy.
 - j. Remediation Policy.
 - k. Evaluations of Theory and Clinical Faculty.
 - l. Evaluations of Theory Presentations.
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - n. Evaluation of Student Achievement.
3. The program must show documented progress by submitting a follow-up report in 10 months, but no later than **March 1, 2010**, evaluating the effectiveness of any corrective actions taken by each element listed in number 2 above.
4. The program must comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2525.

Failure to take these corrective actions may cause the Board to revoke the program's accreditation. In the event additional violations of the accreditation standards are identified, such violations may result in further corrective action or revocation of provisional accreditation.

FUTURE BOARD ACTION

Your program will be placed on the **May 2010** Board Meeting agenda for reconsideration of your accreditation status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) by the fifteenth day of the second month prior to that Board meeting.

OTHER IMPORTANT INFORMATION

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: The program must request Board approval prior to the admission of each class.

In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board regulations.

The program may no longer advertise that it has full accreditation, and should take steps to correct any ongoing advertisements or publications in that regard.

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional accreditation is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at www.bvnpt.ca.gov.

Should you have questions, please do not hesitate to contact the Board.

Sincerely,

TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer

Enclosure

cc: Board Members